

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

Clean Harbors Environmental Services, Inc.

2247 South Highway 71
Kimball, Nebraska 69145
(308) 235-8200

RCRA EPA ID Number: NED981723513

ON

April 8-10, 2014

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), I performed a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at Clean Harbors Environmental Services, Inc. (Clean Harbors), located in Kimball, Nebraska on April 8-10, 2014. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act, as amended. During the CEI, I collected information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. Based on information obtained prior to and during the course of the inspection, I inspected the site as a permitted Treatment, Storage and Disposal Facility (TSDF), a Large Quantity Generator (LQG) of Hazardous Waste, a Large Quantity Handler of Universal Waste, and a Generator of Used Oil. This facility was last inspected for RCRA compliance by Region VII EPA on July 30-31, 2013.

PARTICIPANTS

Clean Harbors Environmental Services, Inc. (Clean Harbors):

Jessica Grow, Facility Compliance Manager
Kelly Whittlesey, Compliance Specialist
James Shields, Facility Operations Manager
Gerald Pennel, Facility Incineration Manager
Bradley Brower, Incineration Manager
Richard Roylance, Laboratory Manager
Jared Hunsaker, General Manager
Kelly Dunegan, Facility Operations Manager
Dave Hickman, Receiving Team Supervisor
Brad Reader, Facility Engineer
Ken Redding, Maintenance Manager
Wayne Elliott, Lab Technician
Deni Waite, Chemist
Chad Waterman, Incinerator Operator

U.S. Environmental Protection Agency (EPA):

Michael W. Tucker, Life Scientist (Lead Inspector)
Edwin G. Buckner, PE, Environmental Engineer

INSPECTION PROCEDURE

Mr. Edwin Buckner, AWMD, accompanied me during this inspection. Mr. Buckner's inspection activities focused on incinerator compliance.

We conducted a limited visual reconnaissance of the Clean Harbors facility from the adjacent roadway and parking lot prior to the inspection. We observed above ground storage tanks, hundreds of 55-gallon drums, and dozens of intermodal containers as items of environmental interest. We observed no emissions from the thermal oxidation unit.

Mr. Buckner and I arrived unannounced at the Clean Harbors facility, located at 2247 South Highway 71, on the morning of April 8, 2014. We proceeded to the guard shack, where we signed the visitors log and were issued week-long identification badges. Ms. Jessica Grow, Facility Compliance Officer, met Mr. Buckner and me at the guard shack and escorted us to a conference room for the entrance briefing. The entrance briefing was attended by Ms. Grow, Ms. Kelly Whittlesey, Compliance Specialist, Mr. James Shields, Facility Operations Manager, Mr. Gerald Pennel, Facility Incineration Manager, Mr. Bradley Brower, Incineration Manager, Mr. Richard Roylance, Laboratory Manager, Mr. Jared Hunsaker, General Manager, and Mr. Kelly Dunegan, Facility Operations Manager. See attachment 1 for a copy of the entrance briefing attendees. During the initial entrance briefing, I presented my credentials to the Clean Harbors representatives and provided them with business cards. I presented the Clean Harbors representatives with a copy of RCRA Section 3007 (a), which provides the authority for conducting RCRA inspections. The Clean Harbors representatives were also presented with a copy of Title 18 U.S. Code, Sections 1001 and 1002, which provides penalties for providing

false and/or misleading information to Federal representatives, and for the possession and use of fraudulent documents. I explained the EPA policy regarding collection of confidential business information (CBI) to the Clean Harbors representatives. I explained that at the conclusion of the inspection Clean Harbors would be provided with a copy of the EPA *Confidentiality Notice*, with which a CBI claim could be made for any or all of the information and documentation collected during the inspection. I also discussed the document receipt form and the general plan for the inspection to the Clean Harbors representatives. I asked Ms. Grow to review the *RCRA Handler Information Report*, which I provided to her during the inspection (attachment 2). Ms. Grow stated that to her knowledge the information was correct.

Ms. Grow, Ms. Whittlesey, and Mr. Dave Hickman, Receiving Team Supervisor, provided me with requested facility information and documentation. Mr. Buckner and I split into separate teams to conduct portions of the visual inspection of the facility. Ms. Whittlesey accompanied me on the visual inspection of the facility. Mr. Buckner was accompanied by Ms. Grow during his portion of the visual inspection of the facility. We were both assisted by various employees during the inspection. The inspection consisted of a discussion of the facility operations, waste generation and waste management practices, a review of the required waste management plans, programs and records, a visual inspection of the permitted storage areas, and a visual inspection of select waste generation and management areas.

Information collected during this inspection is documented on the Nebraska Department of Environmental Quality (NDEQ) RCRA Compliance Evaluation Inspection Checklist for Clean Harbors (attachment 3), NDEQ Large Quantity Generator Checklist and Used Oil Storage requirements (attachment 4) and also in my field notes. Document photocopies were collected as inspection documentation (see attachments 1-10). Attached are the four photographs which were taken as additional documentation (see photographs 1-4). Mr. Buckner prepared the section of this report covering the areas that he inspected. I conducted this inspection in accordance with the procedures described above, and the following EPA Region VII Standard Operating Procedures (SOPs), with any variance noted.

<u>SOP Number</u>	<u>SOP Description</u>
2321.1C	RCRA Compliance Evaluation Inspection

At the conclusion of this CEI, Mr. Buckner and I summarized the findings and recommendations and reviewed them with Ms. Grow, Ms. Whittlesey, Mr. Shields, Mr. Pennel, Mr. Brower, Mr. Roylance, Mr. Hunsaker, Mr. Dunegan, Mr. Brad Reader, Facility Engineer, and Mr. Ken Redding, Maintenance Manager, during an exit briefing (see attachment 5). Ms. Grow signed the *Confidentiality Notice*, indicating that no claim of CBI was being made (attachment 6). I provided Ms. Grow with a *Receipt for Documents and Samples*, which she signed as acknowledgement of receipt (attachment 7). Ms. Grow signed a *Notice of Violation* (NOV) as acknowledgement of receipt (attachment 8). I encouraged the Clean Harbors representatives to respond in writing within 14 calendar days regarding the issue listed on the NOV. I also provided the Clean Harbors representatives with guidance for responding to the NOV.

The following inspection documents were left with Clean Harbors:

Receipt for Documents and Samples (top page of completed carbon copy set)
Confidentiality Notice (top page of completed carbon copy set)
Notice of Violation (top page of completed carbon copy set)

The following Compliance Assistance handouts were left with Clean Harbors:

Security Awareness (EPA pamphlet)
Commercial Motor Vehicle Transportation Security Planning (EPA info sheet)
U.S. EPA Small Business Resources (EPA fact sheet)
Supplemental Information for Small Businesses (EPA fact sheet)
Environmental Compliance Assistance Centers (EPA fact sheet)
Aerosol Can Waste (NDEQ Guidance Document)
Comparison of Hazardous Waste Generator Requirements (NDEQ Fact Sheet)
NDEQ Compliance Assistance Program (NDEQ Fact Sheet)
Solvent Contaminated Shop Towels, Rags, and Wipers (NDEQ Fact sheet)
Manifest Requirements and Frequently Asked Questions in Nebraska (NDEQ Fst)
Universal Waste Regulations (NDEQ Guidance Document)
Used Oil and Used Oil Filter Management (NDEQ Guidance Document)
Used Oil Collection Considerations (NDEQ Guidance Document)
Waste Determinations & Hazardous Waste Testing (NDEQ Guidance Document)
Waste Computers, Monitors, and Electronics (NDEQ Guidance Document)

I also informed the Clean Harbors representatives of the information available at the NDEQ website.

FACILITY DESCRIPTION

Facility Information and Operations

The Clean Harbors industrial waste treatment, storage, and disposal facility (TSDF) is located at 2247 South Highway 71 in Kimball, Nebraska. The facility is owned and operated by Clean Harbors Environmental Services, Inc. The facility is located on 640 acres. The Clean Harbors facility consists of waste receiving areas, storage areas, treatment systems, support buildings, ash monofill, and storm water pond. See attachment 9 for a facility diagram. Clean Harbors is permitted by the NDEQ for the storage, treatment, and disposal of hazardous waste. Waste is stored on-site in preparation for treatment or off-site treatment and disposal. The facility stores and thermally treats liquid, sludge, and solid non-hazardous and hazardous waste. Waste arrives on-site in drums, bulk liquid tankers, and roll-off containers. The waste is sampled and either directly fed to the incinerator, transferred to the Tank Farm for consolidating wet and dry solid feed batches, stored in one of the container storage areas for eventual processing, or shipped off-site to another Clean Harbors facility. The fluidized bed incinerator consists of a combustion system, feed system, ash handling system, and an air pollution control system. The incineration system is monitored and controlled by a computerized distribution control system. Ms. Grow stated that since the last inspection the facility had installed a heli-sieve to separate silty solids

from liquids prior to shredding. The liquids generated by the heli-sieve are piped to the Tank Farm. Clean Harbors also placed a new shredder into operation at the incinerator. Ms. Grow stated that a new Tank Farm began operating in December 2013. Ms. Grow also stated that the waste streams generated by the facility have not changed since the July 2013 RCRA inspection. Incineration operations began at the site in 1995. The facility operates twenty-four hours per day, seven days per week. Clean Harbors has approximately 148 employees.

Facility Status

Mr. Buckner and I inspected Clean Harbors as a Large Quantity Generator of Hazardous Waste. We also reviewed the facility's compliance with its RCRA permit. Clean Harbors current permit was issued June 1, 2009 and expires on May 31, 2014. A copy of the facility's Hazardous Waste Management Permit (Parts I and II) resides in the files and is not included with this report as an attachment. Clean Harbors last submitted a Notification of Regulated Waste Activity on November 18, 2013, as a Large Quantity Generator (greater than 1000 kg per month) of numerous characteristic, and F, P, K, and U-listed hazardous waste (see attachment 10). Clean Harbors is also a Large Quantity Handler of Universal Waste and a Generator or Used Oil. A Facility Description resides in the files and is not included with this report as an attachment.

FINDINGS AND OBSERVATIONS

Facility Wastes and Management

Mr. Buckner and I split into separate teams to conduct portions of the visual inspection of the facility. Ms. Grow accompanied me on the visual inspection of the facility. Mr. Buckner was accompanied by Ms. Whittlesey during his portion of the visual inspection of the facility.

Laboratory - The Clean Harbors Laboratory includes a Metals Lab, Characterization Lab (Wet Chemistry), Ash Lab, Gas Chromatograph Lab, Volatiles Lab, and Instrument Lab.

Location	Activity	Waste Streams	Satellite Accumulation Containers	Generation Rate
Metals Lab	ICP	Acidic waste	5-gallon carboy; closed, labeled	20 gallons/month
	Spectrometer	Plastic vials	30-gallon plastic drum; closed, labeled	120 gallons/month
	ICP	Acidic waste	5-gallon carboy; closed, labeled	10 gallons/month
	Mercury Analyzer	Acidic waste	5-gallon carboy; closed, labeled	40 gallons/month

Characterization Lab	Fume hood	Acidic waste	1-gallon plastic jug, closed, labeled	2 gallons/month
	Lab debris	Rags	21-gallon step can; closed, labeled	150 gallons/month
	Lab debris	Glassware	30-gallon plastic drum; closed, labeled	30 gallons/month
	Ion Chromatography	Basic waste	1-gallon glass jug; closed, labeled	2 gallons/month
	Optical Emissions		3-gallon carboy; closed, labeled	12 gallons/month
	Sample Prep	Liquid vials	1-gallon plastic jug; closed, labeled	10 gallons/month
	Expired Standards		1-gallon plastic jug, closed, labeled	1 gallon/month
Gas Chromatography Lab	Chromatography	Glassware	1-gallon metal can; closed, labeled	1 gallon/month
		Sharps	5-gallon pail; closed, labeled	1 gallon/year
Volatiles Lab	Purge & Trap		1-gallon carboy; closed, labeled	1 gallon/month
	Lab activities	Lab debris	3-gallon pail; closed, labeled	1 gallon/month
		Glassware	3-gallon pail; closed, labeled	1 gallon/month
Ash Lab	TCLP	Acidic waste	5-gallon plastic carboy; closed, labeled	20 gallons/month
		Basic waste	6-gallon plastic carboy; closed, labeled	12 gallons/month
	TCLP	Glassware	21-gallon step can; closed, labeled	80 gallons/month
	Lab activities	PPE, rags, glassware	30-gallon plastic drum; closed, labeled	120 gallons/month
	Waste Solvent	Solvent	5-gallon plastic safety can	20 gallons/month
	Distillation	Cyanide waste	0.5-gallon plastic bottle; closed, labeled	1 gallon/month
Instrument Lab	Instrument calibration	No hazardous waste		

Laboratory 90-Day Hazardous Waste Accumulation Area A (HWAA) - The facility laboratory operates one 90-day HWAA. At the time of the inspection there were five 85-gallon overpack barrels of laboratory waste, one 55-gallon metal drum, and eleven 55-gallon plastic drums in accumulation. All of the containers were closed, labeled as hazardous waste, and dated. The oldest date that I observed was 2/28/2014. I observed no leaks or signs of spills in the Laboratory HWAA.

90-Day Hazardous Waste Accumulation Area B - The facility operates a second 90-day HWAA west of the Tank Farm. At the time of the inspection there were fifty-six roll-off containers of various sizes in accumulation. All of the containers were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in the Area B HWAA. Ms. Grow stated that the roll-off containers held shredded drums destined for the incinerator or landfill.

90-Day Hazardous Waste Accumulation Area C - The facility operates a third 90-day HWAA in the north-west area of the facility. At the time of the inspection there was one 2.5-cubic yard hopper for PPE. The container was closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in the Area C HWAA.

Area 20 - This building houses the truck wash and sampling bays. This building is also a permitted hazardous waste storage area. I observed five 30-cubic yard roll-off containers in Area 20. All five of the roll-off containers were closed, labeled as hazardous waste, and dated. I also observed eight 30-gallon plastic can satellite accumulation containers (SAC) for waste PPE. All eight of the SACs were closed and labeled as hazardous waste. I also observed one 55-gallon poly drum SAC for empty aerosol containers. The SAC was closed and labeled as hazardous waste.

Mr. Buckner and I observed an approximately 3' x 12' x 5' metal box in Area 20 (photo 1). The metal box was used to contain hazardous waste trailer heels (see photo 2 for contents of metal box). The metal box was utilized as a SAC and was not labeled (photos 1, 2, and 3). The metal box was in poor condition and would not close (photo 3).

NOV # 1 Failure to identify contents of satellite accumulation container (Area 20 metal box) is in violation of T-128, Ch. 10, 005.01B.

NOV # 2 Failure to maintain satellite accumulation container in good condition is a violation of permit condition III.D.

NOV # 3 Failure to close a container holding hazardous waste during storage, except when adding or removing waste, is in violation of permit condition III.F.1.

The hazardous waste trailer heels were removed from the metal box SAC, and the metal box SAC was repaired. Prior to the completion of the visual inspection, the metal box SAC was closed and labeled as hazardous waste.

Area 25 - This is a permitted hazardous waste storage area. Area 25 includes hundreds of 55-gallon drums and dozens of 1-cubic yard Gaylord boxes. All of the containers which I observed were closed, labeled as hazardous waste, and dated. I observed no signs of leaks or spills in Area 25.

Area 40 - This area is permitted for the storage of non-bulk containers of liquid or solid waste. I observed drums of product and approximately thirty empty 350-gallon metal totes in Area 40. I observed no hazardous waste being generated or stored in Area 40 during the inspection. I observed no leaks or signs of spills in Area 40.

Area 50A - This area is permitted for storage of bulk and non-bulk dry solids. There were six 30-cubic yard roll-off containers stored in Area 50A during the inspection. Each container is covered with a tarpaulin while in storage. Hardened hazardous waste was observed on the outside lip of one roll-off container. See photo 1 for picture of hazardous waste on the outside lip of roll-off container.

NOV # 3 Failure to close a container holding hazardous waste during storage, except when adding or removing waste, is in violation of permit condition III.F.1.

The hazardous waste was removed from the lip of the roll-off container during the inspection.

Area 50B - This is a permitted hazardous waste storage area for bulk and non-bulk dry solids. All of the containers which I observed were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in Area 50B.

Area 50 - Area 50 serves as the waste receiving building and also houses the permitted incinerator.

Area 50C - This area is permitted for tank storage. I observed no leaks or signs of spills in Area 50C.

Area 50D/E - This is a permitted hazardous waste storage area for bulk container storage of wet solids. There were two Roberoller bulk liquid agitating tanker trailers in this area. I observed no leaks or signs of spills in Area 50D/E. I noticed that several Subpart BB tags were missing from equipment on the Roberollers.

NOV # 4 Failure to place Subpart BB tags on equipment located at the Roberollers is in Violation of permit condition IV.K.1.

Area 55 - This is a permitted hazardous waste treatment area. The new shredder was installed in this area. Two Shear Shredders, one Magnetic Separator, and one Liquid Solid Screw Conveyor were in operation during the inspection. The Paint Can Shredder and Knife Shredder were out of service during the inspection.

Area 57 Warehouse Building - This building includes two permitted storage areas (Areas 57A and 57B) and a staging area for off-site shipments (Area C). Drum sampling is conducted in this area. All of the hazardous waste storage containers which I observed were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in Area 57.

Area 57D Oxidizer Building - This building is permitted as the oxidizer storage building. All of the hazardous waste storage containers which I observed were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in the Oxidizer Building.

Area 57F Thaw Building - This is a heated building used to thaw bulk containers during cold weather. All of the hazardous waste containers which I observed were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in the Thaw Building.

Area 70C - This is a permitted hazardous waste storage area for bulk and non-bulk dry solids. All of the hazardous waste storage containers which I observed were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in Area 70C.

Area 95 - This is a permitted hazardous waste storage area for bulk and non-bulk liquids and solids. All of the hazardous waste storage containers which I observed were closed, labeled as hazardous waste, and dated. I observed no leaks or signs of spills in Area 95. Tank T-926B is used to capture water in the secondary containment sump. The tank appeared to be in good condition.

Area 90 Wastewater Treatment Building - This building was not in service during the time of the inspection. I observed no issues or concerns in Area 90.

Area 58 Tank Farm - The Area 58 Tank Farm began operations in the 3rd quarter of 2013. The Tank Farm storage area is permitted for six hazardous waste above ground storage tanks (AST) with 20,000 gallon capacities. Mr. Buckner and I visually inspected the six ASTs. Five of the ASTs were in use at the time of the inspection. T-145 was not in service during the inspection. Clean Harbors appears to meet all Subpart BB, Subpart CC, and permit requirements regarding tank labeling and inspections. All parts visually observed were labeled as required. I observed three 50-gallon plastic SACs in use during the inspection. All three of the SACs were closed and labeled as hazardous waste.

Area 70 Tank Farm - The Tank Farm storage area is permitted for eight hazardous waste above ground storage tanks (AST) with 20,000 gallon capacities. Mr. Buckner and I visually inspected the eight ASTs. Two of the ASTs were out of service at the time of the inspection. We also visually inspected the four 20,000-gallon waste feed tanks. Clean Harbors appears to meet all Subpart BB, Subpart CC, and permit requirements regarding tank labeling and inspections. All parts visually observed were labeled as required. I observed five SACs in use during the inspection. All five of the SACs were closed and labeled as hazardous waste.

Area 45 Thermal Oxidation Unit (TOU) - Mr. Buckner provided the following account of his inspection of the TOU:

Ms. Grow escorted me on my visual inspection of the Thermal Oxidation Unit (incinerator) and associated equipment. I began by examining the TOU control room. The operator, Mr. Chad Waterman, described how on Monday mornings they test the automatic waste feed cut off (AWFCO) system. The computer, upon the operator's command, inputs a signal that will indicate an AWFCO. The test does not generate false parameters or operating data to trigger the test. The computer then recognizes this as an excursion of the operating limits and simulates an AWFCO. The waste feed to the TOU is not actually cut off so the facility may continue steady state operations, but the computer does flag that a cut off signal was produced and the operator notes the indicators on his control panel. On the first Monday of each month, the system actually cuts off waste flow to the TOU when performing this test. Personnel in the plant visually verify that the valves and belts have stopped waste flow.

I observed the control panel and noted that all operating parameters were within permit limits. See attachment 11 for copies of the operating screen from April 8 and 9. The new computer operating system no longer allows a direct screen print, but Clean Harbors has developed a method to produce a simulated screen print with the actual data. Although I examined the control room in the morning, because of the new system the print out of the operating screen is from a later time. We left the control room and climbed the TOU to the sixth level, the highest level with monitoring or feed equipment. While I was on that level, I scanned the fence line for breaks or other security issues. I saw no problems from there. I also looked down on the roll-off boxes. From that vantage, I saw no open containers. I examined each level of the TOU during descent. I noticed that approximately one dozen Subpart BB tags were missing from equipment on the feed lines to the TOU.

NOV # 4 Failure to place Subpart BB tags on equipment located at the TOU is in violation of permit condition IV.K.1.

There were more tags missing, but those other pieces of equipment were painted orange to indicate they were in hazardous waste service.

After examining the TOU, I observed from the ground the air pollution control equipment train, including the bag house, lime and carbon injection, ash sampling, and ash storage bins. All equipment appeared to be functioning properly.

Area 85 Ash Stabilization Building - I went through the ash processing building and examined all the containers therein. All the containers appeared to be in good condition and properly managed except for two. Container H976-018 of catvac ash, dated 4/3/14, had four holes worn through its tarp where other containers had repeatedly sat on top of it. Container F316, dated 2/15/14, had two, approximately four inch cuts in the plastic covering it. Clean Harbors personnel taped shut the holes in the plastic while I was there. We then rejoined Mr. Tucker and Ms. Whittlesey in the office.

This ends the section prepared by Mr. Buckner.

Spent Fluorescent Lamps - Clean Harbors serves as a pass-through facility for spent fluorescent lamps on their way to a destination facility.

Used Oil - Used oil is generated by the hydraulic power packs. The generation rate is approximately 3000 gallons per year. Used oil is also generated from truck and mobile equipment maintenance. The generation rate is approximately 300 gallons per year. All of the containers used to store used oil which I observed during the inspection were closed and labeled as Used Oil. I observed no signs of leaks or spills. The used oil is burned on-site for its fuel value. No used oil is shipped off-site for disposal.

Permit Requirements

General Facility Conditions - Clean Harbors appears to be in compliance with the general facility conditions related to design and operation of the facility, general waste analysis, security, inspections, personnel training, requirements for ignitable, reactive, or incompatible waste, preparedness and prevention, contingency plan and recordkeeping and reporting.

General Inspection Requirements - Daily inspections are documented for the container storage areas, tank equipment, and the hazardous waste storage tank system. Annual inspections are conducted for the tank storage systems. Clean Harbors appears to be in compliance with the general inspection requirements.

Storage in Containers - All of the containers observed in storage during the inspection were correctly closed, marked as hazardous waste, and dated. The condition and management of the containers was appropriate for the waste being stored. Container storage areas and their containment systems are inspected daily. The facility appears to be in permit compliance with the requirements for storage in containers.

Storage in Tanks - Clean Harbors has fourteen hazardous waste above ground storage tanks (ASTs) with 20,000 gallon capacities, plus four 20,000-gallon waste feed tanks. The tanks' exterior, high level alarm, level indicator, pressure relief valve, atmospheric conservation vent, and emergency shut-off valves are inspected daily. The facility appears to be in permit compliance with the requirements for storage in tanks. Subpart BB inspections are conducted daily on the tank farm. Subpart CC inspections are conducted annually on the aboveground spent solvent storage tanks. The facility appears to be in permit compliance with the requirements for air emission standards.

Incineration - Clean Harbors fluidized-bed incinerator was inspected by Mr. Buckner. The facility appears to be in permit compliance with the requirements for incineration. The facility appears to be in permit compliance with the requirements for waste minimization.

Uniform Hazardous Waste Manifests Requirements

Clean Harbors receives van and bulk shipments of hazardous waste. Hazardous waste manifests are stored separately depending on mode of receipt. I reviewed approximately ten manifests generated each month from August 1, 2013 through April 4, 2014. I did not observe any issues of concern. Ms. Grow stated that no manifest discrepancy letters to the NDEQ had been generated since the last inspection.

The Land Disposal Restriction Notices were on file for all waste codes shipped off-site during August 1, 2013 through April 4, 2014, and appeared to meet the regulatory standards. I did not observe any issues of concern.

Hazardous Waste Accumulation Requirements

I reviewed the weekly checklists for hazardous waste container accumulation areas from August 1, 2013 through April 4, 2014. The checklists document the weekly inspections performed at the hazardous waste container accumulation areas. The weekly inspections were documented and included all of the required information.

Satellite Accumulation

I observed thirty SACs in use during the time of the inspection. All of the SACs observed during the inspection, with the exception of the metal box SAC located in Area 20, were closed and labeled as hazardous waste.

Preparedness and Prevention

All of the areas of the Clean Harbors facility which we visually inspected, with the exception of the above mentioned containers in Area 20 and Area 50A, appear to be operated so as to minimize the possibility of a hazardous waste release and have the necessary response equipment and communication devices readily available. Aisle space adequate to allow for unobstructed movement of personnel and equipment was observed in all areas of the facility. The necessary arrangements have been made with local police, fire, emergency responders, and hospitals.

Contingency Plan

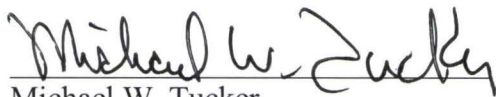
The contingency plan was updated in June 2013. An emergency coordinator is available at all times for response to emergencies. The plan describes emergency actions to be taken by facility personnel. The plan describes arrangements made with police, fire departments, and hospitals. A list containing the names, office phone numbers, home phone numbers, home addresses, and cell phone numbers of the emergency coordinators is included in the contingency plan. The contingency plan is updated when personnel changes occur.

Personnel Training

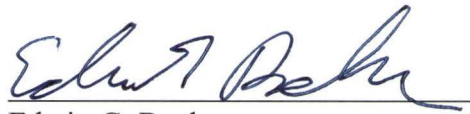
My review of the Clean Harbors training records showed that all employees had received the appropriate training, in the required time frame. The training records for Ms. Grow, Ms. Whittlesey, and Mr. Kevin Wynne were reviewed in depth and appeared to meet the regulatory requirements. Mr. Wynne is the primary emergency coordinator.

SUMMARY

Clean Harbors Environmental Services, Inc. was operating as a Permitted Hazardous Waste Storage and Treatment Facility, a Large Quantity Generator of Hazardous Waste, a Large Quantity Handler of Universal Waste, and a Generator of Used Oil during the time of the inspection. The violations cited were discussed during the inspection process and the exit briefing. We reviewed all Permit requirements and all applicable Large Quantity Generator requirements and no additional apparent issues of concern were observed. However, further EPA review may change or add to our findings.



Michael W. Tucker
Life Scientist
Date: April 22, 2014



Edwin G. Buckner
Environmental Engineer

Attachments

- Photo Log (1 page)
- Photographs (3 pages/4 photographs)
- Attachment 1 - Entrance Briefing Participants (1 page)
- Attachment 2 - *RCRA Handler Information Report* (3 pages)
- Attachment 3 - NDEQ Clean Harbors RCRA Compliance Evaluation Inspection Checklist (54 pages)
- Attachment 4 - NDEQ LQG and Used Oil Checklists (5 pages)
- Attachment 5 - Exit Briefing Participants (1 page)
- Attachment 6 - *Confidentiality Notice* (1 page)
- Attachment 7 - *Receipt for Documents and Samples* (1 page)
- Attachment 8 - *Notice of Violation* (1 page)
- Attachment 9 - Facility Diagram (1 page)
- Attachment 10 - Notification of Regulated Waste Activity (5 pages)
- Attachment 11 - Incinerator Operating Records (10 pages)

PHOTO LOG

Facility Name / City: Clean Harbors Environmental Services, Inc.
2247 South Highway 71
Kimball, Nebraska 69145

Facility ID #: NED981723513

Date: April 8, 2014

Photographer: Michael W. Tucker

Type of Camera: Nikon Coolpix AW100, Serial #: 32156463

Digital Recording Media: Transcend SDHC Card 8GB

All digital photos were copied by: Michael W. Tucker on April 21, 2014.

All digital photos were copied to: CD-R

Original copy is stored in: CD-R. Digital photos were downloaded to CD-R all by Michael W. Tucker. No changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Appr. Time	File Name (IMG-Pxxx xxxx.jpg)	Description
1	Michael Tucker	4/8/14	14:14	DSCN0033	Photo of metal box satellite accumulation container used to collect trailer heels.
2	Michael Tucker	4/8/14	14:15	DSCN0034	Photo of metal box satellite accumulation container showing contents.
3	Michael Tucker	4/8/14	14:16	DSCN0035	Photo of metal box satellite accumulation container exhibiting poor condition/inability to close.
4	Michael Tucker	4/8/14	14:31	DSCN0036	Photo of hazardous waste on the top lip of a 30-cubic yard intermodal container.

Clean Harbors Environmental Services, Inc.
2247 South Highway 71
Kimball, Nebraska 69145

Photos taken by Michael W. Tucker
On April 8, 2014



Clean Harbors
Kimball, Nebraska 69145
April 8, 2014

Photo of metal box satellite accumulation container used to collect trailer heels.

Photo 1 Michael W. Tucker mw2



Clean Harbors
Kimball, Nebraska 69145
April 8, 2014

Photo of metal box satellite accumulation container showing contents.

Photo 2 Michael W. Tucker mw2



Clean Harbors
Kimball, Nebraska 69145
April 8, 2014

Photo of metal box satellite accumulation container exhibiting poor condition/inability to close.

Photo 3 Michael W. Tucker

mw



Clean Harbors
Kimball, Nebraska 69145
April 8, 2014

Photo of hazardous waste on the top lip of a 30-cubic yard intermodal container.

Photo 4 Michael W. Tucker

mw

Entrance 4/8

PARTICIPANTS

NAME

TITLE

- Kelly Whittlesey

Compliance Specialist

- Jessica Grow

Compliance Manager

- Gerald Pennel

Incineration Manager

- Rich Roylance

LABORATORY MANAGER

- Jared Hunsaker

GM

- Kelly Dunnehan

Facility Ops mgr.

- James Shields

Facility Ops Manager

- Brady Brower

INC MANAGER / BLENDS / ASH DEPT.

HANDLER INFORMATION REPORT

January 6, 2014

Procedures for performing Site Visits

If the facility wants to make a change, they must complete a Notification of Regulated Waste Activity form and send it to Waste Management Section, NDEQ, 1200 N St., The Atrium Bldg, Ste 400, Lincoln, NE 68509. The form can be found at <http://deq.ne.gov>. Go to Publications & Forms, Waste Management, Notification of Regulated Waste Activity EPA Form 8700-12.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/WEMM.

EPA RCRA ID Number: NED981723513

Name of Company/Site: CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
Location of Site: 2247 S HIGHWAY 71
KIMBALL, NE 69145
KIMBALL County

Land Type: Private

NAICS: 562211 - HAZARDOUS WASTE TREATMENT AND DISPOSAL

Mailing Address: 2247 S HIGHWAY 71
KIMBALL, NE 69145-9727

Site Contact: JARED W HUNSAKER
Job Title: GENERAL MANAGER
Address: 2247 S HIGHWAY 71
KIMBALL, NE 69145-9727
Email: HUNSAKERJ@CLEANHARBORS.COM
Phone Number: (308)235-8200

Current Owner of Site: CLEAN HARBORS INC.
Phone Number: (781)792-5000
Owner Type: Private

Current Operator of Site: CLEAN HARBORS ENVIRONMENTAL SERVICES INC
Phone Number: (308)235-8200
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: * Federal Large Quantity Generator
Importer into US of RCRA Hazardous Waste
Haz Waste Treater, Storer, Disposer, per EPA
Haz Waste Treater, Storer, Disposer, per site
Universal Waste Destination Facility
Universal Waste
Large UW Accumulator: Batteries
Large UW Accumulator: LQH UW Electronic Recycling
Large UW Accumulator: Lamps
Large UW Accumulator: Pesticides
Large UW Accumulator: Mercury containing equipment

Hazardous Wastes Handled: *

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020	D021
D022	D023	D024	D025	D026	D027	D028
D029	D030	D031	D032	D033	D034	D035
D036	D037	D038	D039	D040	D041	D042
D043	F001	F002	F003	F004	F005	F006

(Continued on back)

Date of Site Visit:

4/8/2014

Name of Inspector (Please print):

Michael W. Tucker

(Check one): ☒ EPA R7 ENSV ☐ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector:

Michael W. Tucker

HANDLER INFORMATION REPORT

January 6, 2014

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F007	F008	F009	F010	F011	F012	F019
F024	F025	F032	F034	F035	F037	F038
F039	K001	K002	K003	K004	K005	K006
K007	K008	K009	K010	K011	K013	K014
K015	K016	K017	K018	K019	K020	K021
K022	K023	K024	K025	K026	K027	K028
K029	K030	K031	K032	K033	K034	K035
K036	K037	K038	K039	K040	K041	K042
K043	K044	K045	K046	K047	K048	K049
K050	K051	K052	K060	K061	K062	K069
K071	K073	K083	K084	K085	K086	K087
K088	K093	K094	K095	K096	K097	K098
K099	K100	K101	K102	K103	K104	K105
K106	K107	K108	K109	K110	K111	K112
K113	K114	K115	K116	K117	K118	K123
K124	K125	K126	K131	K132	K136	K141
K142	K143	K144	K145	K147	K148	K149
K150	K151	K156	K157	K158	K159	K161
K169	K170	K171	K172	P001	P002	P003
P004	P005	P006	P007	P008	P009	P010
P011	P012	P013	P014	P015	P016	P017
P018	P020	P021	P022	P023	P024	P026
P027	P028	P029	P030	P031	P033	P034
P036	P037	P038	P039	P040	P041	P042
P043	P044	P045	P046	P047	P048	P049
P050	P051	P054	P056	P057	P058	P059
P060	P062	P063	P064	P066	P067	P068
P069	P070	P071	P072	P073	P074	P075
P076	P077	P078	P082	P084	P085	P087
P088	P089	P092	P093	P094	P095	P096
P097	P098	P099	P101	P102	P103	P104
P105	P106	P108	P109	P110	P111	P112
P113	P114	P115	P116	P118	P119	P120
P121	P122	P123	P127	P128	P185	P188
P189	P190	P191	P192	P194	P196	P197
P198	P199	P201	P202	P203	P204	P205
U001	U002	U003	U004	U005	U006	U007
U008	U009	U010	U011	U012	U014	U015
U016	U017	U018	U019	U020	U021	U022
U023	U024	U025	U026	U027	U028	U029
U030	U031	U032	U034	U035	U036	U037
U038	U039	U041	U042	U043	U044	U045
U046	U047	U048	U049	U050	U051	U052
U053	U055	U056	U057	U058	U059	U060
U061	U062	U063	U064	U066	U067	U068
U069	U070	U071	U072	U073	U074	U075
U076	U077	U078	U079	U080	U081	U082
U083	U084	U085	U086	U087	U088	U089
U090	U091	U092	U093	U094	U095	U097

(Continued on next page)

Date of Site Visit:

4/8/14

Name of Inspector (Please print):

Michael W. Tucker

(Check one): ☒ EPA R7 ENSV ☐ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector:

Michael W. Tucker

HANDLER INFORMATION REPORT

January 6, 2014

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U098	U099	U101	U102	U103	U105	U106
U107	U108	U109	U110	U111	U112	U113
U114	U115	U116	U117	U118	U119	U120
U121	U122	U123	U124	U125	U126	U127
U128	U129	U130	U131	U132	U133	U134
U135	U136	U137	U138	U140	U141	U142
U143	U144	U145	U146	U147	U148	U149
U150	U151	U152	U153	U154	U155	U156
U157	U158	U159	U161	U162	U163	U164
U165	U166	U167	U168	U169	U170	U171
U172	U173	U174	U176	U177	U178	U179
U180	U181	U182	U183	U184	U185	U186
U187	U188	U190	U191	U192	U193	U194
U196	U197	U200	U201	U202	U203	U204
U206	U207	U208	U209	U210	U211	U213
U214	U215	U216	U217	U218	U219	U220
U221	U222	U223	U225	U226	U227	U228
U234	U235	U236	U237	U238	U239	U240
U243	U244	U246	U247	U248	U249	U271
U278	U279	U280	U328	U353	U359	U364
U367	U372	U373	U387	U389	U394	U395
U404	U409	U410	U411			

I 04/05/10 1+ 1st N 02/06/97 N 07/27/05 1+

Certified by Part A

on 12/02/13 by
JARED HUNSAKER 11/18/13
GENERAL MANAGER
MICHAEL CRISENBERY 11/11/13
VP ENV COMPLIANCE

Date of Site Visit:

4/8/2014

Name of Inspector (Please print):

Michael W. Tucker

(Check one): ☒ EPA R7 ENSV ☐ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector:

Michael W. Tucker

NDEQ RCRA COMPLIANCE EVALUATION INSPECTION CHECKLIST

Clean Harbors Thermal Oxidation Unit

Kimball, Nebraska

RCRA ID#/Permit #: NED981723513

General Information

Date(s) of Inspection: 4/8/2014 -

Number of Employees: 148

Name of Inspector(s):

Michael Tucker
Edwin Buckner

Operating Hours: 24/7.

Name/Title of Facility Personnel:

Jessica Grow Compliance Specialist Manager
Kelly Whittlesey Compliance Specialist

Confidentiality Claim Made (Title 115, Chapter 4): Yes/No

If Yes, List Documents:

Security Items

Chain link security fence completely surrounding active storage and treatment facilities (II.E.1.): Yes/No

Condition of fencing: Good

Signs saying "Danger - Unauthorized Personnel Keep Out" in English and Spanish located at each entrance and other locations to be seen from any approach (II.E.2.): Yes/No

Condition of Signs (Legible from 25 ft. away): Good

Manned guard station at facility gates and entrances (II.E.1.): Yes/No

24 Hour continuous surveillance system monitoring active portion of facility (II.E.1.): Yes / No

Have there been any unauthorized entries in the past year (II.E.3): Yes/No

If yes, list incidents and if/when reported:

90-Day Accumulation Areas

90-Day Area A (north side of laboratory)

Date: 4/8/2014 Time: AM

Number of containers accumulated and contents:

5 55-gallon Overpack Drums
11 55-gallon pdy Drums
1 55-gallon Metal Drum

Container labeled "Hazardous Waste" (T-128, Ch 10, 004.01G): Yes / No

If No, number and location:

Container marked with an accumulation date (T-128, Ch 10, 004.01F): Yes / No

If No, number and location:

Containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All Containers Closed (III.F.1): Yes / No

If No, number and location:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4): Yes / No

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.G): Yes / No

Incompatible wastes are kept in separate containers (III.H.1.): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.H.3): Yes / No

Additional Comments:

oldest Date = 2/28/2014

90-Day Accumulation Areas (continued)

90-Day Area B (west of tank farm)

Date: 4/8/14 Time:

25-40 cubic yard Roll-offs

Number of containers accumulated and contents:

56 - contents HW

Going out (shredded Drums) → incinerator or landfill

Container labeled "Hazardous Waste" (T-128, Ch 10, 004.01G): Yes/No

If No, number and location:

Container marked with an accumulation date (T-128, Ch 10, 004.01E): Yes/No

If No, number and location:

Containers in good condition (III.D): Yes/No

If No, describe condition:

Wastes compatible with containers (III.E): Yes/No

If No, describe incompatibility:

All Containers Closed (III.F.1): Yes/No

If No, number and location:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes/No

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4): Yes/No

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.G): Yes/No

Incompatible wastes are kept in separate containers (III.H.1): Yes/No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.H.3): Yes/No

Additional Comments:

OK

90-Day Accumulation Areas (continued)

90-Day Area C (outside northwest active facility fence line)

Date: 4/8 Time: PM

Number of containers accumulated and contents:

2.5 cubic yard Hopper-
Ror PPE

Container labeled "Hazardous Waste" (T-128, Ch 10, 004.01G): Yes/No

If No, number and location:

Container marked with an accumulation date (T-128, Ch 10, 004.01F): Yes/No

If No, number and location:

Containers in good condition (III.D): Yes/No

If No, describe condition:

Wastes compatible with containers (III.E): Yes/No

If No, describe incompatibility:

All Containers Closed (III.F.1): Yes/No

If No, number and location:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes/No

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4): Yes/No

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.G): Yes/No

Incompatible wastes are kept in separate containers (III.H.1.): Yes/No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.H.3): Yes/No

Additional Comments:

Truck Wash & Sampling Bays, Area 20

Permitted Dress

Date: 1/8/14 Time: PM

Availability and Access to internal communications or alarm system (II.I.1.a) (II.I.3.a): Yes ☒ No ☐

Type and location: 2-way Radio, Site with Alarm

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b) Yes No

Type and location: 2-way radio, on body.

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c.) ☒ Yes ☐ No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d) (Yes / No)

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II, H 1): Yes / No

Satellite Accumulation Containers

Number of Containers accumulated and contents:

Containers labeled to identify contents (T-128, Ch 10, 005.01B): Yes/No

If No, number and location:

All containers in good condition (III.D): Yes ☒ No ☐

If No, describe condition:

Wastes compatible with containers (III.E) ☒ Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): ~~Yes~~ / No

If No, number and location: 3' x 12' x 5' metal Box

39125

Truck Wash & Sampling Bays (continued)

Area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Additional Comments:

30 - CY,

2 - Roll-off - Sampling Bay
C, L, D

2 Roll-off - Sampling Bay
C, L, D

1 - Roll-off - C, L, D 4/7/14

Container Storage Area 25

Equipment

Date: 4/8/14 Time: PM

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c.): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 190,000 gallons of bulk liquid wastes or 189,970 gallons of non-bulk liquid wastes are stored in this area (III.A & Appendix II): Yes / No Amount:

No more than 5,760 cubic yards of solid wastes are stored in this area (III.A & Appendix II): Yes / No Amount:

Bulk containers stacked no more than 3 high and non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Container Storage Area 25 (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1) Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2) Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.) Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b) Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c.) Yes / No

Area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1) Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2) Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4) Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1) Yes / No

Additional Comments:

Container Storage Area 40

Equipment

Date: 4/8 Time:

1 customer Haspina

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 39,000 gallons of liquid wastes and 193 cubic yards of solid wastes are stored in this area (III.A & Appendix II): Yes / No Amount:

Non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

empty, 350 Gallon
Metal Totes
~30 -

Container Storage Area 40 (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): Yes / No

Area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): Yes / No

Additional Comments:

4/8/14

mw

Container Storage Area 50A**Equipment**

6-Row-off (shredder material)

Date: 4/8 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 360 cubic yards of waste are stored in this area (III.A & Appendix II): Yes / No Amount:

Bulk containers stacked no more than 2 high and non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Container Storage Area 50A (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1) Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b.): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): Yes / No

Wastes in containers have no free liquids (III.A & Appendix II): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): Yes / No

Additional Comments:

D₁ - failure to minimize release of H₂ -
30 cy - roll-off.

Container Storage Area 50B

Equipment

Date: 4/8 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 1,260 cubic yards of waste are stored in this area (III.A & Appendix II): Yes / No Amount:

Bulk containers stacked no more than 2 high and non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Container Storage Area 50B (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): Yes / No

Wastes in containers have no free liquids (III.A & Appendix II): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): Yes / No

Additional Comments:

Waste Receiving Bldg. (Area 50)
Equipment

Incinerator

Date: 7/8 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage – Area 50D

Product Only

No more than of 51,480 gallons (approx. 936 drums) in storage (III.A & Appendix II): ~~Yes~~ No Amount:

All containers in good condition (III.D): Yes / No

If No, describe condition:

N/A

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Waste Receiving Bldg. (continued)

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

NO HW Storage.

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4.): Yes / No

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.G): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.H.1): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.H.2): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.H.3): Yes / No

Drum storage area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Tank Storage – Area 50C (Level B PPE Required when Operating)

Dry solids (no free liquids) received in two 150 yd³ steel tanks with removable lids (IV.A): Yes / No

Tag: H-170A,B

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Processed dry solids transferred to one 30 yd³ steel incinerator feed tank (IV.A): Yes / No

Tag: H-386

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Wet solid wastes received in one 30 yd³ steel tank (IV.A): Yes / No

Tag: H-180

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Equipped with a closed vent system to carbon canisters (IV.E.8): Yes / No

Waste Receiving Bldg. (continued)

2 robbie-rollers.

agitated tanks

Wet solid wastes stored in four 50 yd³ steel tanks for incineration (IV.A): Yes / No

Tag: H-342A-D

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Equipped with a closed vent system to carbon canisters (IV.E.8): Yes / No

Incinerator
↓
carbon

Liquid waste from drums transferred to one 6,000 gallon steel tank via vacuum pump system (IV.A): Yes / No

Tag: T-141

Condition of tank (IV.E.1):

Not in Service at time of Inspection

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overfill (IV.A): Yes / No

Equipped with a closed vent system to incinerator or carbon canisters (IV.E.7): Yes / No

Tanks containing ignitable or reactive waste are protected from conditions that may cause waste to ignite (II.H):

Yes / No

Incompatible wastes are not placed in the same tank or into an unwashed tank previously containing an incompatible waste (IV.G.): Yes / No

Tanks in this area are in secondary containment system (IV.A): Yes / No

Containment free of liquid or removed within 24 hours (IV.E.4 & IV.E.5): Yes / No

Containment free of cracks and gaps (IV.D.6): Yes / No

Additional Comments:

Subpart BB - OK - pumps, labeled, tags, No leaks.

See SOD samp area

Container Storage Area 50E (wet solids feed bulk containers)

Equipment

Date: 4/8 Time:

2 rubber-rollers.

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c.): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No Storage.

No more than 11,280 gallons of liquid wastes are stored in this area (III.A & Appendix II): Yes / No
Amount:

Non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

NA

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

NA

Container Storage Area 50E (continued)

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): Yes / No

Area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): Yes / No

Additional Comments:

2 Robbie-rollers

missing Tag

50E - missing tags.

Waste Processing Building (Area 55) (Level C PPE Required)

Equipment

Date: 4/1/8 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Tank Storage

Dry solids (no free liquids) received in two 95 yd³ carbon steel hoppers (IV.A & Appendix IV): Yes / No

Tag: H-150A,B

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Tanks containing ignitable or reactive waste are protected from conditions that may cause waste to ignite (II.H):

Yes / No

Incompatible wastes are not placed in the same tank or into an unwashed tank previously containing an incompatible waste (IV.G): Yes / No

Miscellaneous Units

Dry Solids Pretreatment Units (VI.A & Appendix VII)

Shear Shredder, G-174: Yes / No

Condition:

Good

Shear Shredder, G-175: Yes / No

Condition:

Good

Magnetic Separator, K-172: Yes / No

Condition:

Good

Waste Processing Building (continued)

Liquid Solid Screw Conveyor, K-151: ☒ Yes / ☐ No

Condition:

Good

Paint Can Shredder, G-158: Yes / ☐ No

Condition:

Knife Shredder, G-159: Yes / ☐ No

Condition:

Out of Service during Inspection

All Miscellaneous Units marked with tag number (VI.D.1): Yes / No

Miscellaneous Units G-174 and G-175 are equipped with a functioning nitrogen blanket to purge oxygen (VI.C.13.a) ☒ Yes / ☐ No

Oxygen detection system and O₂ less than 5%: ☒ Yes / ☐ No

Tanks and this area are in secondary containment system (IV.A): ☒ Yes / ☐ No

Containment free of liquid or removed within 24 hours (IV.E.1): ☒ Yes / ☐ No

Containment free of cracks and gaps (IV.D.6): ☒ Yes / ☐ No

Particulate and organic emission controls operational (VI.C.8): ☒ Yes / ☐ No

Additional Comments:

Warehouse Building – Area 57**Equipment**

Date: 4/9 Time: AM

Drum Sampling (in bound).
Some pass-thru drums (other facility)

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Receiving – Area 57A

No more than 893 drums or 224 totes in storage (III.A & Appendix II): Yes / No Amount:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Container Receiving – Area 57A (continued)

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4.): Yes / No

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.G): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.H.1): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.H.2): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.H.3): Yes / No

Drum storage area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Container Storage – Area 57B

No more than 3,264 drums or 816 totes in storage (III.A & Appendix II): Yes / No Amount:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Container Storage – Area 57B (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4): Yes / No

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.G): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.H.1): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.H.2): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.H.3): Yes / No

Drum storage area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Additional Comments:

57C = staging Area (Drums sorted)
All Drums C, H, P
Good Condition
OK

Oxidizer Building – Area 57D

Equipment

Date: 4/9 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 6,160 gallons of liquid wastes and 30 cubic yards of solid wastes are stored in this area (III.A & Appendix II): Yes / No Amount:

Non-bulk containers stacked no more than one high (III.A & Appendix II): Yes / No

If No, describe:

No Class 4 Oxidizers are being stored (III.C.10): Yes / No

If No, describe:

Oxidizers are stored away from organic, flammable, dehydrating or reducing agents (III.C.11): Yes / No

If No, describe:

Wastes are not placed on wooden pallets or materials that are easily combustible (III.C.12): Yes / No

If No, describe:

Oxidizer Building – Area 57D (continued)

No other wastes or materials are added to the oxidizer containers (III.C.13): Yes / No

If No, describe:

Shrink wrap or other easily combustible materials such as paper are not used to tie or bind containers (III.C.14):

Yes No

If No, describe:

TO keep containers palletized – comes in wrapped.

A minimum of 15 feet of aisle space is maintained between the racks (III.C.15): Yes / No

If No, estimate distance:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): Yes / No

Oxidizer Building – Area 57D (continued)

Area is equipped with a containment system (III.J): ☒ Yes / No Describe:

Free of cracks or gaps (III.J.1): ☒ Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): ☒ Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): ☒ Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): ☒ Yes / No

Additional Comments:

ED Thaw Building – Area 57F
Equipment

Date: 4/9/14 Time: PM

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): ☒ Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): ☒ Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (III.J.c): ☒ Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): ☒ Yes / No

“No Smoking” signs located where there is a hazard from ignitable or reactive wastes (II.H.1): ☒ Yes / No

Container Storage

No more than 40,394 gallons of liquid wastes are stored in this area (III.A & Appendix II): ☒ Yes / No
Amount:

No more than 200 cubic yards of solid wastes are stored in this area (III.A & Appendix II): ☒ Yes / No
Amount:

Bulk containers stacked no more than one high and non-bulk containers stacked no more than 2 high (III.A & Appendix II): ☒ Yes / No

If No, describe:

All containers in good condition (III.D): ☒ Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): ☒ Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): ☒ Yes / No

If No, number and location:

Thaw Building – Area 57F (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): Yes / No

Area is equipped with a containment system (III.J): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Incompatible wastes do not share a common sump (III.C.16): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Additional Comments:

Container Storage Area 70C

Equipment

Date: 4/9/14 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

All - OK

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 2,970 cubic yards of waste are stored in this area (III.A & Appendix II): Yes / No Amount:

Bulk containers stacked no more than 3 high and non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Container Storage Area 70C (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): ☒ Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): ☒ Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): ☒ Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): ☒ Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b): ☒ Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c): ☒ Yes / No

Wastes in containers have no free liquids (III.A & Appendix II): ☒ Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): ☒ Yes / No

Additional Comments:

Container Storage Area 95

Equipment

Date: 4/8 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 192,000 gallons of bulk liquid wastes or 290,800 gallons of non-bulk liquid wastes are stored in this area (III.A & Appendix II): Yes / No Amount:

No more than 4,050 cubic yards of solid wastes are stored in this area (III.A & Appendix II): Yes / No Amount:

Bulk containers stacked no more than 3 high and non-bulk containers stacked no more than 2 high (III.A & Appendix II): Yes / No

If No, describe:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Container Storage Area 95 (continued)

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Ignitable or reactive wastes located at least 50 feet from the facility property line (III.C.4.): Yes / No

If No, list number and location of containers:

Incompatible wastes are kept in separate containers (III.C.5.a.): Yes / No

Wastes are not placed in unrinsed containers previously containing an incompatible waste (III.C.5.b.): Yes / No

Incompatible wastes and materials are separated by a dike, berm, wall or other device (III.C.5.c.): Yes / No

Area is equipped with a containment system (III.J.): Yes / No Describe:

Free of cracks or gaps (III.J.1): Yes / No

Designed to drain liquids to prevent contact with containers (III.J.2): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.J.4): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Tank Storage

One 56,400 gallon steel tank for collection of containment system liquids (IV.A & Appendix IV): Yes / No

Tag: T-926B

Condition of tank (IV.E.1): Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

Additional Comments:

Ash Stabilization Building, Area 85 (Level C PPE required when operating)

Equipment

Date: 4/8/14 Time:

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Container Storage

No more than 396 cubic yards incinerator residue are stored in this area (III.A & Appendix II): Yes / No
Amount:

All containers in good condition (III.D): Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): Yes / No

If No, number and location:

Containers marked to identify contents and start accumulation date (Title 128, Chapter 20, 014.01B1): Yes / No

If No, list containers:

① Tarp was worn with holes
② Plastic Tarp ripped; fixed during inspection.

Ash Stabilization Building (continued)

Containers stored and handled in a manner to prevent rupture or leak (III.F.2): Yes / No

If No, describe condition:

Adequate aisle space to allow unobstructed movement of personnel and emergency equipment (II.I.4): Yes / No

Ash stabilization building is equipped with a containment system (III.D): Yes / No Describe:

Free of cracks or gaps (III.D.7.a.): Yes / No

Designed to drain liquids to prevent contact with containers (III.D.7.b.): Yes / No

Containment free of spilled or leaked waste or removed within 24 hours (III.D.7.d.): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.): Yes / No

Tank Storage (Area 80)

Ash Day Bin

Eight 3,200 ft³ steel ash storage tanks receiving air pollution control residue (IV.A & Appendix IV): Yes / No

Tag: H-408A-H

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

One 200 ft³ steel ash transfer tank (IV.A & Appendix IV): Yes / No

Tag: H-969

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

One 200 ft³ steel mixing tank for ash stabilization (IV.A & Appendix IV): Yes / No

Tag: A-951

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.A): Yes / No

OK

Ash Stabilization Building (continued)

Miscellaneous Units

Ash Reprocessing (VI.A & Appendix VII)

Shredder, G-952: Yes / No

Condition:

Pulverizer, G-955: Yes / No

Condition:

All Miscellaneous Units marked with tag number (VI.D.1): Yes / No

Tanks and this area are in secondary containment system (IV.A): Yes / No

Containment free of liquid or removed within 24 hours (IV.E.4): Yes / No

Containment free of cracks and gaps (IV.D.6): Yes / No

Additional Comments:

NOT
IN
Service

Wastewater Treatment Building, Area 90

Equipment

Date: 4/9 Time:

Not in Service

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Tank Storage

NA

Wastewater collected in one 60,000 gallon steel tank outside building (IV.A & Appendix IV): Yes / No

Tag: T-616

Condition of tank (IV.E.1):

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

Treated wastewater is stored in one 10,000 gallon steel tank outside building (IV.A. & Appendix IV): Yes / No

Tag: T-688

Condition of tank (IV.E.1):

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

Tanks and this area are in secondary containment system (IV.A): Yes / No

Containment free of liquid or removed within 24 hours (IV.E.4): Yes / No

Containment free of cracks and gaps (IV.D.6): Yes / No

Additional Comments:

Not in Service

Tank Farm, Area 58
Equipment

6 Tanks

Date: 4/9 Time: PM.

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c.): Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): Yes / No

Satellite Accumulation Containers

Number of Containers accumulated and contents:

3 - HW

Containers labeled to identify contents (T-128, Ch 10, 005.01B) ☒ Yes / No

If No, number and location:

All containers in good condition (III.D): ☒ Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): ☒ Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): ☒ Yes / No

If No, number and location:

Plastic Trash
Bins

50 Gallons

Tank Farm, Area 58 (continued)

Tank Farm 58

Tank Storage

Two 20,000 gallon steel liquid waste storage tanks (IV.A & Appendix IV): Yes / No

Tag: T-144, 147

Condition of tank (IV.E.1):

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overfill (IV.A): Yes / No

Equipped with a closed vent system to incinerator or carbon canisters (IV.E.7): Yes / No

Four 23,000 gallon steel liquid waste storage tanks (IV.A & Appendix IV): Yes / No

Tag: T-142, 143, 145, 146

Condition of tank (IV.E.1):

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overfill (IV.A): Yes / No

Equipped with a closed vent system to incinerator or carbon canisters (IV.E.7): Yes / No

T-145 = empty & other 3 = liquid from drums.

Miscellaneous Units

Tank Farm Pretreatment Units (VI.A & Appendix VII):

Strainer/Magnetic Separator S-147: Yes / No

Condition: New

All Miscellaneous Units marked with tag number (VI.D.1): Yes / No

Tanks containing ignitable or reactive waste are protected from conditions that may cause waste to ignite (II.H):

Yes / No

Incompatible wastes are not placed in the same tank or into an unwashed tank previously containing an incompatible waste (IV.G.4): Yes / No

Tanks in this area are in secondary containment system (IV.A): Yes / No

Containment free of liquid or removed within 24 hours (IV.E.4 & IV.E.5): Yes / No

Containment free of cracks and gaps (IV.D.6): Yes / No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Additional Comments:

New in 3rd Quarter 2013.

ED Tank Farm, Area 70
Equipment

ALL OK

Date: 4/9/14 Time: PM

Availability and Access to internal communications or alarm system (II.I.1.a)(II.I.3.a): ☒ Yes / No

Type and location:

Telephone or radio available at scene for summoning emergency assistance (II.I.1.b): ☒ Yes / No

Type and location:

Availability and Access to portable fire extinguishers, fire control equipment, spill control and decontamination equipment (II.I.1.c): ☒ Yes / No

Location:

Condition:

Adequate water volume and pressure to supply fire fighting hoses, sprinklers, etc. (II.I.1.d): ☒ Yes / No

"No Smoking" signs located where there is a hazard from ignitable or reactive wastes (II.H.1): ☒ Yes / No

Satellite Accumulation Containers

Number of Containers accumulated and contents:

5- HW

Containers labeled to identify contents (T-128, Ch 10, 005.01B): ☒ Yes / No

If No, number and location:

All containers in good condition (III.D): ☒ Yes / No

If No, describe condition:

Wastes compatible with containers (III.E): ☒ Yes / No

If No, describe incompatibility:

All containers closed (III.F.1): ☒ Yes / No

If No, number and location:

Tank Farm, Area 70 (continued)

Tank Storage

2 out of service during inspection

Eight 20,000 gallon steel liquid waste storage tanks (IV.A & Appendix IV): Yes / No

Tag: T-108, 110, 112, 114, 116, 118, 120, 124

Condition of tank (IV.E.1):

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

Equipped with a closed vent system to incinerator or carbon canisters (IV.E.7): Yes / No

Four 20,000 gallon steel liquid waste incinerator feed tanks (IV.A & Appendix IV): Yes / No

Tag: T-320, 322, 360, 361

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

Equipped with a closed vent system to incinerator or carbon canisters (IV.E.7): Yes / No

Direct Feed System

One 692 gallon stainless steel direct feed flush tank (IV.A & Appendix IV): Yes / No

Tag: T-327

Condition of tank (IV.E.1):

Good

Adequate space around tank for emergency equipment (IV.F.2): Yes / No

Automatic level alarm and indicator with feed cutoff to prevent overflow (IV.A): Yes / No

Equipped with a closed vent system to incinerator or carbon canisters (IV.E.7): Yes / No

Miscellaneous Units

Tank Farm Pretreatment Units (VI.A & Appendix VII):

Grinder G-129: Yes / No

Condition: Good

Strainer S-102: Yes / No

Condition: Good

Strainer/Magnetic Separator S-105: Yes / No

Condition: Good

Strainer/Magnetic Separators S-103, 104: Yes / No

Condition: Good

Strainers S-323A,B: Yes / No

Condition: Good

All Miscellaneous Units marked with tag number (VI.D.1): Yes / No

Tank Farm, Area 70 (continued)

Tanks containing ignitable or reactive waste are protected from conditions that may cause waste to ignite (II.H):

☒ Yes / ☐ No

Incompatible wastes are not placed in the same tank or into an unwashed tank previously containing an incompatible waste (IV.G.): ☒ Yes / ☐ No

Tanks in this area are in secondary containment system (IV.A): ☒ Yes / ☐ No

Containment free of liquid or removed within 24 hours (IV.E.4 & IV.E.5): ☒ Yes / ☐ No

Containment free of cracks and gaps (IV.D.6): ☒ Yes / ☐ No

Prohibited wastes are not being accepted, stored or incinerated (III.B.1): Yes / No

Additional Comments:

→ plywood
Cushions installed under container to protect
Coating on floor (rubber mats to be
purchased in future)

Incinerator, Area 45

EB

Date: 4/8/14 Time: 1000

Dry solids feed system in good condition: Yes / No

Wet solids feed system in good condition: Yes / No

Viscous (lean water) feed system in good condition: Yes / No

Nonviscous (energetic liquid) feed system in good condition: Yes / No

Bed Letdown Vibratory Screen, S-334 in good condition (VI.C.1): Yes / No

Screen marked with tag number (VI.D.1): Yes / No

Induced draft fan & cartridge filter operating (VI.C.7): Yes / No

Performance Standards

Stack Test Date:

Combustion gases exiting stack through operational pollution control system (V.E.1.): Yes / No

Hydrogen Chloride emissions (V.E.3):

Tag: Stoich

Not to exceed 4 lbs/hr: Yes / No

Reported Value:

or

Not to exceed 1% of HCl in flue gas prior to entering the APC equipment: Yes / No

Particulate Matter emissions not to exceed 0.013 gr./scf corrected to 7% O₂ (V.E.4): Yes / No

Tag: DT - 429A.F

Reported Value:

Toxic metals emissions (V.E.5.a):

Antimony not to exceed 0.002646 grams/second: Yes / No

Arsenic not to exceed 0.000076 grams/second: Yes / No

Barium not to exceed 0.006174 grams/second: Yes / No

Beryllium not to exceed 0.000025 grams/second: Yes / No

Cadmium not to exceed 0.002646 grams/second: Yes / No

Chromium not to exceed 0.001058 grams/second: Yes / No

Hr Rolling Avg

0.00017

0.0581

~~5.6~~ 0.255

~~40.7~~ 0.763

0.00581

Incinerator (continued)
Performance Standards

EB

Chromium VI not to exceed 0.000378 grams/second: Yes / No	Reported Value:
Lead not to exceed 0.002646 grams/second: Yes / No	Reported Value:
Mercury not to exceed 0.001496 grams/second: Yes / No	Reported Value:
Nickel not to exceed 0.028224 grams/second: Yes / No	Reported Value:
Selenium not to exceed 0.000630 grams/second: Yes / No	Reported Value:
Silver not to exceed 0.000252 grams/second: Yes / No	Reported Value:
Thallium not to exceed 0.000088 grams/second: Yes / No	Reported Value:
Combined Cadmium & Lead not to exceed 230 ug/dscm (V.E.5.b): Yes / No	
Reported Value:	
Combined Arsenic, Beryllium, Chromium and Chromium VI not to exceed 92 ug/dscm (V.E.5.c): Yes / No	
Reported Value:	
Dioxin (2,3,7,8 - TCDD) equivalents not to exceed 3.0×10^{-9} grams/second (V.E.6): Yes / No	
Reported Value:	

Waste Feed Limitations

Date: Time:

Total Halogen feed not to exceed 556.69 lbs/hr 12-HRA (V.F.2.): Yes / No	Reported Value:
Tag: DT-CLB.F	

Physical waste feed limitations HRA (V.F.4.):

Total waste feed not to exceed 21,467 lbs/hr (V.F.4.a.): <u>Yes</u> / No	Reported Value:
Tag: WIY-731	16957

Dry solid waste feed not to exceed 15,201 lbs/hr (V.F.4.a.i.): <u>Yes</u> / No	Reported Value:
Tag: DT-389B.F	4902

Pumpable waste feed not to exceed 12,118 lbs/hr (V.F.4.a.ii.): <u>Yes</u> / No	Reported Value:
Tag: DT-732B.F $3591 + 3,358 + 2,732 = 9,681$	

Toxic metals waste feed limitations HRA (V.F.5.):

Antimony not to exceed 13.375 lbs/hr: Yes / No	Reported Value:
Tag: DT-SBB.F	

Arsenic not to exceed 11.314 lbs/hr: Yes / No	Reported Value:
Tag: DT-ASB.F	

Incinerator (continued)
Waste Feed Limitations

EB

Barium not to exceed 51.000 lbs/hr: Yes / No Tag: DT-BAB.F	Reported Value:
Beryllium not to 7.328 lbs/hr: Yes / No Tag: DT-BEB.F	Reported Value:
Cadmium not to exceed 69.525 lbs/hr: Yes / No Tag: DT-CDB.F	Reported Value:
Total Chromium not to exceed 70.016 lbs/hr: Yes / No Tag: DT-CRB.F	Reported Value:
Lead not to exceed 69.525 lbs/hr: Yes / No Tag: DT-PBB.F	Reported Value:
Mercury not to exceed 0.0558 lbs/hr: Yes / No Tag: DT-HGB.F	Reported Value:
Nickel not to exceed 182.500 lbs/hr: Yes / No Tag: DT-NIB.F	Reported Value:
Selenium not to exceed 2.900 lbs/hr: Yes / No Tag: DT-SEB.F	Reported Value:
Silver not to exceed 2.280 lbs/hr: Yes / No Tag: DT-AGB.F	Reported Value:
Thallium not to exceed 0.273 lbs/hr: Yes / No Tag: DT-TLB.F	Reported Value:
Total Cd, Pb feed rate not to exceed 69.525 lb/hr: Yes/ No Tag: DT-SVMC	Reported Value:
Total As, Be, Cr feed rate not to exceed 70.016 lb/hr: Yes / No Tag: DT-LVMC	Reported Value:
Ash Feed Rate not to exceed 12,034 lb/hr: Yes / No Tag: DT-AshC	Reported Value:

Operating Conditions

Date: Time:

Primary combustion chamber shall be maintained at or above 1,400°F HRA (V.G.1): Yes / No Reported Value: 1526
Tag: DT-306, 1,386° instantaneous minimum Tag: TISS-306

Secondary reaction chamber shall be maintained at or above 1,491°F HRA (V.G.1): Yes / No Reported Value: 1569
Tag: DT-314, 1,475°F instantaneous minimum, Tag: TISS-314

Stack flow at or below 25,151 dscfm HRA (V.G.2): Yes / No Reported Value: 22 808
Tag: DT-SFB.F

Incinerator (continued)
Operating Conditions

EB

Stack gas total hydrocarbon concentration not to exceed 10 ppmv HRA (V.G.3): Yes / No
Tag: DT-488B.F Note: adjusted to 7% O₂ dry basis

Reported Value: 6.14

Baghouse Inlet Temperature not to exceed 395 °F HRA (V.G.5): Yes / No
Tag: DT-440B.F

Reported Value: 373

Incinerator Pressure above fluidized bed not to exceed atmospheric for more than 5 minutes (V.G.4): Yes / No
Tag: PDIY-316

Pressure differential within baghouse more than 1 inch water column (V.G.6): Yes / No
Tag: PDI-428

No wastes fed during start-up or shut-down unless within operating conditions (V.G.): Yes / No

Waste feed ceased when operating conditions or waste feed limits exceeded (V.G.7): Yes / No

Carbon injection system operating properly (V.G.8): Yes / No
Tag: XA-503

Automatic feed cutoffs working (V.G.8.a): Yes / No

Advisory alarm for reduced carbon flow or screw auger not in Auto (V.G.8.b): Yes / No
Tag: WIT-503

Feed rate not less than 22.2 lb. per hour (V.G.8.c): Yes / No
Tag: DT-503B.F

Use activated virgin lignite carbon meeting permit requirements (V.G.8.d): Yes / No

Carbon carrier fluid flow rate not less than 35 acfm (V.G.8.e): Yes / No
Tag: AIT-503

Computer link to DCS data provided to NDEQ Lincoln office (V.J): Yes / No

Additional Comments:

Area 45-Missing Tags
TOW

Record Keeping
Operating Record/Reporting

EB

Date: 4/9/14 Time:

A description and quantity of each waste received (II.K.1.a): Yes / No

The date of storage of the waste if stored at the facility (II.K.1.a): Yes / No

The date of incineration of the waste (II.K.1.a): Yes / No

The location of each hazardous waste within the facility (II.K.1.b): Yes / No

The quantity of hazardous waste being stored at each location, referencing manifest numbers (II.K.1.b): Yes / No

Records and results of Waste analyses performed (II.K.1.c): Yes / No

Summary reports of all incidents requiring implementation of the contingency plan (II.K.1.d): Yes / No NA

Report to Director within 15 days all fires and explosions at waste management areas (II.K.6): Yes / No NA

3 years of records/results of inspections of safety, emergency, security & operating equipment (II.K.1.e): Yes / No

Incinerator operations monitoring, testing or analytical data and corrective actions (II.K.1.f): Yes / No

Copies of notice to generators of permit status to accept wastes (II.K.1.g): Yes / No

All closure cost estimates (II.K.1.g.): Yes / No

Records of all sampling, monitoring and testing conducted to meet permit requirements (II.K.1.i): Yes / No

All computations, calculations and evaluations performed to support conclusions in reports (II.K.1.j): Yes / No

Personnel Training Records

nw

Date: 4/9/14 Time:

Job title for each position and the name of the employee filling that position (II.G.) Yes / No

40 CFR 264.16(d)(1)

List any discrepancies:

Written job description for each position listed (II.G.) Yes / No

40 CFR 264.16(d)(2)

Description of type and amount of introductory and continuing training for each position (II.G.) Yes / No

40 CFR 264.16(d)(3)

Record of training received by facility personnel (I.G.2.)(II.G.): Yes / No

40 CFR 264.16(d)(4)

List inconsistencies with required training:

Training records of former employees maintained for at least 3 years (II.G.) Yes / No

40 CFR 264.16(d)(5)

Record Keeping (continued)

Waste Analysis Records (Part B, Volume 1, Section C-2)

Date: 4/9/14 Time: PM

Copy of Waste Analysis Plan maintained at the facility until closure (I.G.1.): Yes/No

Completed Generator Waste Material Profile Sheets on file for each waste accepted (C-2, 2.0): Yes/No

Waste approval by CHESI Personnel based on Generator Waste Material Profile Sheet (C-2, 2.1): Yes/No

Verification/Inspection of Loads within 10 days of receipt (C-2, 3.1):

Documentation of Manifest Discrepancies: Yes/No

Container/Contents inspection by sampling personnel: Yes/No

Waste sampling and analysis (C-2):

Waste characterization conducted initially and when waste changes thereafter (C-2, 2.1): Yes/No
Ash, Viscosity, BTU's, Density, Total Halogens
Corrosivity, Reactivity, Metals, Radiation

Fingerprint analysis conducted on each load (C-2, 4.0): Yes/No
Physical Description, Ignitability, Cyanide, Sulfur,
Oxidizer, pH, Water Reactivity, Radioactivity

Blended waste feed analysis on each waste feed stream (C-2, 7.0): Yes/No
Ash Content, Total Halogen, Total Sulfur,
Metallic Constituent Analysis

Ash Residue analysis (C-2, 10.2): Yes/No
TCLP Organics, TCLP Metals, Dioxins

Contingency Plan/ Preparedness & Prevention mw?

Date: 4/9/14 Time:

Copy of Contingency Plan maintained at the facility until closure (I.G.3): Yes/No

Copy of Contingency Plan and any revisions submitted to NDEQ, local fire & police departments, hospitals and state/local emergency response teams (II.J.3): Yes/No

Contingency Plan immediately updated as necessary (II.J.4.a): Yes/No

Record Keeping (continued)

Contingency Plan Contents (II.J.2)

Names, addresses, phone numbers (home and office) of emergency coordinators ☒ Yes / No

Designate the primary emergency coordinator and alternates: ☒ Yes / No

Lists emergency equipment, location and physical description: ☒ Yes / No

Contains evacuation plan, routes and describes evacuation signal: ☒ Yes / No

Emergency Coordinator available or on call at all times (II.J.5) ☒ Yes / No

Name: Kevin Wyne Position: Incineration Supervisor Home Phone: In Contingency
Shift Spec
Arrangements to familiarize local police, fire department and emergency response teams with facility (II.I.5.a.i.):
☒ Yes / No

Agreements designating primary emergency authority where there is more than one (II.I.5.a.ii.): ☒ Yes / No

Agreements with state emergency response teams, contractors, and equipment suppliers (II.I.5.a.iii.): ☒ Yes / No

Arrangements to familiarize local hospitals with wastes, and types of potential injuries, illnesses (II.I.5.a.iv.):
☒ Yes / No

Documentation in Operating Record of refusal to enter emergency agreements or arrangements by local authorities (II.I.5.b.): ☒ Yes / No

Emergency equipment tested as necessary to assure proper operation in emergency (II.I.2.): ☒ Yes / No

Frequency:

Records:

Availability of portable HAZMAT unit (Volume 1, Part F, 10.1): ☒ Yes / No

Fully equipped: ☒ Yes / No

Record Keeping (continued)

Manifest Records

Date: 4/9/14 Time: PM

Sign and date each copy of manifest as received (II.K.3.a.): ☒ Yes ☐ No

Note significant manifest discrepancies on the manifest (II.K.3.b.): ☒ Yes ☐ No

Report discrepancies to NDEQ if not resolved in 15 days (II.K.4.): ☒ Yes ☐ No

Provide transporter with copy of manifest (II.K.3.c.): ☒ Yes ☐ No

Send copy of manifest to generator within 30 days (II.K.3.d.): ☒ Yes ☐ No

Copies of each manifest retained for at least 3 years from date of delivery (II.K.3.e.): ☒ Yes ☐ No

Comply with generator requirements for hazardous waste shipments from the facility (II.K.3.f.): ☒ Yes ☐ No

Report unmanifested shipments of hazardous waste to NDEQ within 15 days (II.K.5.): ☒ Yes ☐ No

Land Disposal Restriction notices for wastes received and shipped (VI.A): ☒ Yes ☐ No

Inspection Records

Date: 4/9/14 Time:

Inspection records maintained for three years (II.F.4): ☒ Yes ☐ No

Inspection records contain date, time of inspection, name of inspector, observations, remedial actions (II.F.4):
☒ Yes ☐ No

Initial load receiving inspection (II.C.)(Volume 1, Section C-2, Part 3.0):

Check for leakage: ☒ Yes ☐ No

Check for Manifest discrepancies: ☒ Yes ☐ No

Daily inspection of incinerator and ancillary equipment (V.H.2): ☒ Yes ☐ No

Signs of Leaks, spills, emissions, malfunctions: ☒ Yes ☐ No

Weekly inspection of incinerator automatic waste feed cut-off system (V.H.3): ☒ Yes ☐ No

Monthly full function test of incinerator waste feed automatic cutoff system (V.H.4): ☒ Yes ☐ No

Quarterly inspection of incinerator surface temperature (V.H.5): ☒ Yes ☐ No

Record Keeping (continued)

Weekly/daily container inspection logs for the following areas (III.I.1):

- Waste Receiving Bldg. Drum Storage Area (Area 50D): ☒ Yes / ☐ No
- Container Storage Area 25: ☒ Yes / ☐ No *Daily*
- Container Storage Area 40: ☒ Yes / ☐ No *Daily*
- Container Storage Area 50A: ☒ Yes / ☐ No *"*
- Container Storage Area 50B: ☒ Yes / ☐ No *"*
- Container Storage Area 50E: ☒ Yes / ☐ No *Daily*
- Container Storage Area 57A: ☒ Yes / ☐ No *Daily*
- Container Storage Area 57B: ☒ Yes / ☐ No *"*
- Container Staging Area 57C: ☒ Yes / ☐ No *"*
- Container Storage Area 57D: ☒ Yes / ☐ No *"*
- Container Storage Area 57F: ☒ Yes / ☐ No *Daily*
- Container Storage Area 70C: ☒ Yes / ☐ No
- Container Storage Area 95: ☒ Yes / ☐ No
- Ash Stabilization Bldg. container storage area (Area 85): ☒ Yes / ☐ No
- 10 90-Day Accumulation Area A (laboratory): ☒ Yes / ☐ No
- ✓ 90-Day Accumulation Area B (west of tank farm): ☒ Yes / ☐ No
- 90-Day Accumulation Area C (north of active facility fence): ☒ Yes / ☐ No

Daily tank and ancillary equipment inspections (IV.F.1):

- Waste Processing Bldg. Area 55 (Tags: H-150A,B): ☒ Yes / ☐ No
- Waste Receiving Bldg. Area 50C (Tags: T-141, H-170A,B, H-386, H-180, H-342A-D): ☒ Yes / ☐ No
- Container Storage Area 95 (Tag: T-926B): ☒ Yes / ☐ No
- Ash Stabilization Bldg. Area 85 (Tags H-408A-H, H-969, A-951): ☒ Yes / ☐ No
- Wastewater Treatment Bldg. Area 90 (Tags: T-616, 688): ☒ Yes / ☐ No
- Tank Farm, Area 58 (Tags: T-142, 143, 144, 145, 146, 147): ☒ Yes / ☐ No
- Tank Farm, Area 70 (Tags: T-108, 110, 112, 114, 116, 118, 120, 124, 320, 322, 360, 361): ☒ Yes / ☐ No
- Direct Feed System, Area 70 (Tag: T-327): ☒ Yes / ☐ No

Record Keeping (continued)

Daily Inspection of Miscellaneous Units (V.I.E.1):

Dry Solids Shear Shredder, G-158: ☒ Yes / No

Dry Solids Knife Shredder, G-159: ☒ Yes / No

Dry Solids Magnetic Separator, K-172: ☒ Yes / No

Dry Solids SSI Shear Shredder, G-174: ☒ Yes / No

Dry Solids Williams Shear Shredder, G-175: ☒ Yes / No

Tank Farm Strainer, S-102: ☒ Yes / No

Tank Farm Strainer/Magnetic Separators, S-103, 104, 105, 147: ☒ Yes / No

Tank Farm Grinder, G-129: ☒ Yes / No

Tank Farm Strainers, S-323A,B: ☒ Yes / No

Incinerator Bed Letdown Vibratory Screen, S-334: ☒ Yes / No

Ash Stabilization Shredder, G-952: ☒ Yes / No

Ash Stabilization Pulverizer, G-955: ☒ Yes / No

Repairs required as a result of inspections must be completed within 90 days of discovery (II.F.3): ☒ Yes / No

CHES - higher Standard

7/31/13 last CEI

Carbon canister inspections (IV.H.4) (VI.C.9):

Waste Processing Bldg. (Area 55) Daily: ☒ Yes / No

Replacement upon breakthrough (500 ppm) within 24/48 hours: ☒ Yes / No

Waste Receiving Bldg. (Area 50C) Daily: ☒ Yes / No

Replacement upon breakthrough (500 ppm) within 24/48 hours: ☒ Yes / No

Tank Farm (Area 58) Daily: ☒ Yes / No

Replacement upon breakthrough (500 ppm) within 24/48 hours: ☒ Yes / No

Tank Farm (Area 70) Weekly: ☒ Yes / No

Replacement upon breakthrough (500 ppm) within 24/48 hours: ☒ Yes / No

Direct Feed System (Area 70) Weekly: ☒ Yes / No

Replacement upon breakthrough (500 ppm) within 24/48 hours: ☒ Yes / No

Truck Wash (Area 20) Weekly: ☒ Yes / No

Replacement upon breakthrough (500 ppm) within 24/48 hours: ☒ Yes / No

Record Keeping (continued)

Annual comprehensive tank inspections (IV.H.2.):

Test Date:

Waste Receiving Bldg. Area 50D: Yes / No
Tags: H-180, H-342A-D, H-386, T-141

Adequate Thickness: Yes / No

Container Storage Area 95: Yes / No
Tag: T-926B

Adequate Thickness: Yes / No

Wastewater Treatment Bldg. Area 90: Yes / No
Tags: T-616, 688

Adequate Thickness: Yes / No

Tank Farm, Area 58: Yes / No
Tags: T-142, 143, 144, 145, 146, 147

Adequate Thickness: Yes / No

Tank Farm, Area 70: Yes / No
Tags: T-108, 110, 112, 114, 116, 118, 120, 124, 320, 322, 360, 361

Adequate Thickness: Yes / No

Direct Feed System, Area 70: Yes / No
Tag: T-327

Adequate Thickness: Yes / No

Ash Day Bins (Area 80): Yes / No
Tags: H-408A-H

Adequate Thickness: Yes / No

Ash Processing (Area 85): Yes / No
Tags: A-951, H-969

Adequate Thickness: Yes / No

ED.

Calibration Records (V.H.1 and Appendix V)

EB

Date:

Time:

Stack Flow (Tags: FT-429, PT-431, TT-431) - Quarterly, (Tag: TE-431) - Annually: Yes / No

Stack gas total hydrocarbon (THC) (Tags: AT-488A,B) - Daily: Yes / No

Activated Carbon Feed Rate (Tags: WIT-503A,B entered as LCP-501A,B) - Quarterly: Yes / No

Activated Carbon Carrier Fluid (Tag: FE-503) - Annually: Yes / No

Baghouse inlet temperature (Tags: TT-440A,B, TE-440A,B) - Annually: Yes / No

Spray Drier Absorber (SDA) temperature (Tags: TT-429A,B, TE-429A,B) - Annually: Yes / No

Baghouse pressure differential sensor (Tags: PDT-428) - Quarterly: Yes / No

Bed level sensors (Tags: LIT-315A) - Annually: Yes / No

Differential Bed Temperature: (Tags: TE-306A-D, TT-306A-D) - Annually: Yes / No

Fluidized bed airflow (Tags: PT-204, TT-205, FT-206, FT-207) - Quarterly: Yes / No

Stack gas (oxygen) (Tags: AT-481A,B, AT-483, AT-483B) - Daily: Yes / No

Secondary reaction chamber pressure (Tag: PT-319) - Quarterly: Yes / No

Primary combustion chamber temperature (Tags: TE-306A-D, TT-306A-D) - Annually: Yes / No

ED

Record Keeping (continued)
Calibration Records

EB

Secondary reaction chamber temperature (Tags: TT-314A,B, TE-314A,B) - Annually: Yes / No

Dry solids feed rate (Tag: WIT-389) - Semiannual: Yes / No

Pumpable waste feed rate (Tags: FE-345A,B, FE-321,) - Annually: Yes / No

(Tags: PDT-360A-B, 361A-B, SIT-362A-B) - Quarterly: Yes / No

Miscellaneous Records/Reports

Date: Time:

Hazardous Waste Treatment Fee submitted by March 1 each year (Title 128, Ch. 24, 001.02): Yes / No

Biennial Report Submitted by March 1 for every odd year (Title 128, Chapter 4, 005.01): Yes / No

Closure Plan available at site (I.G.4.)(II.L.2.a.): Yes / No

Complete set of plans and engineering/construction drawings (as-built) maintained on site (I.H.2.): Yes / No

Liability Coverage (II.O.1-4.): Yes / No

Annual Waste Minimization Certification (I.I.1.): Yes / No

Waste Reduction Impact Statement (I.I.2): Yes / No

Copy of Permit Part B Application available at site (I.G.8): Yes / No

Inspection Schedule available at site (I.G.7): Yes / No

Semiannual Fugitive Emissions from Leaks (Subpart BB) Report Submitted (III.K.8): Yes / No

Quarterly Surficial Soil Monitoring for metals and semivolatiles in soils (VI.H.1): Yes / No

Annual Surficial Monitoring for Dioxin in soils (VI.H.2): Yes / No

Quarterly ash delisting analyses summary reports (Title 128, Appendix IV): Yes / No

Submitted to NDEQ within 30 days after end of quarter: Yes / No

Quarterly list of tanks and miscellaneous units out of service for >30 days in Quarter (I.K.9): Yes / No

Notification of changes to standards for ash delisting by July 1 annually (Title 128, Appendix IV): Yes / No

Permit required compliance schedules met (I.K.): Yes / No

List those not met:

Additional Comments:

Large Quantity Generator Checklist
Title 128 - Chapter 10 citations

4/8 - 4/9/2004

mwz

Applicability☒Generate \geq 1,000 kg/month hazardous waste (001.01).*☒

Generate > 1 kg/month acute hazardous waste (001.01A).

☒Generate > 100 kg spill residue, soil, or debris contaminated with acute hazardous waste (001.01B).
NO spill of Acute Hazardous Waste

*Note. Certain hazardous wastes may be managed as universal wastes under Ch 25 and not included in quantity determinations (001.04D).

Large quantity generator requirements☒

Hazardous waste determination (Ch 4, 002 ref. by 001.05).

☒

Notification/identification number requirements (Ch 4, 002 through 004 ref. by 001.05).

☒

Renotify of changes in status (Ch 4, 003.02).

☒

Reporting and recordkeeping requirements (Ch 4, 005 as ref by 001.05).

☒

Comply with Ch 20, 005.01D - land disposal restrictions (004.01H).

Manifest requirements☒

Manifests and copies (002).

Pre-transport requirements☒

Package waste in accordance with DOT requirements (003).

Accumulation requirements☒Accumulate for \leq 90 days (004.01).*

(* Note: Accumulation beyond this time is subject to TSDF regulations of Ch 12 - 15, 21, and 22 (004.02).)

☒

Container condition requirements (004.01A1).

☒

Container closed (004.01A2).

Accumulation requirements (cont'd)

- ☒ Container handling (004.01A3).
- ☒ Weekly inspection (004.01A4).
- ☒ Ignitable or reactive wastes must be 50 ft. from a property line (Ch 16 002.01A per 004.01A5).
- ☒ Incompatible materials must be separated from hazardous waste (Ch 16 002.01B per 004.01A5).
- ☒ "No Smoking" signs posted for ignitable wastes (Ch 16, 001.01 per 004.01A5).
- ☒ Dating (004.01F).
- ☒ Labeling (004.01G).
- ☒ Tank requirements (004.01B):
- ☒ Tank integrity assessment and annual assessment for existing tanks w/o secondary containment (265.191 and 265.194(i)).
- ☒ Certified tank design and installation for new tanks (265.192).
- ☒ Containment and detection of releases (265.193). *In twAA.*
- ☒ Daily inspections (265.195). *- areas subject to spills*
- ☒ Response to leaks or spills (265.196).
- ☒ Special requirements for ignitable or reactive wastes (265.198).
- ☒ Special requirements for incompatible wastes (265.199).
- ☒ Waste analysis and trial test (265.200).
- ☒ Closure of container and tank storage areas (256.111) and disposal or decontamination (265.114).

Satellite accumulation

- ☒ ≤ 55 gallons of hazardous waste or ≤ 1 quart acute hazardous waste at or near the point of generation (005.01).
- ☒ Container in good condition (004.01A1 as ref 005.01A).
- ☒ Container closed (004.01A2 as ref 005.01A)

Satellite accumulation (cont'd)

Yes

Container is compatible with the waste (Ch 16, 002.01C ref 005.01A).

X

Mark the container "Hazardous Waste" or other words (005.01B).

X

Move the excess amount to the accumulation area and comply with labeling, dating, and storage requirements within 3 days of reaching 55 gallons or 1 quart (005.02).

International shipments

Yes

NO Export Are there international shipments of hazardous waste (006). In From Canada

Preparedness and prevention

X

Internal communication or alarm system (Ch 17, 003.01 per 004.01H).

X

External communication for summoning assistance (Ch 17, 003.02 per 004.01H).

X

Portable fire extinguishers and fire control equipment (Ch 17, 003.03 per 004.01H).

X

Water at adequate volume and pressure for hoses and fire sprinklers (Ch 17, 003.04 per 004.01H).

X

Emergency equipment tested annually (Ch 17, 004 per 004.01H).

multiple times each year

X

All hazardous waste handlers must have access to the internal communication system (Ch 17, 005.01 per 004.01H).

X

If there is just one worker on-site during operation they must have immediate access to the external communication system (Ch 17, 005.02 per 004.01H).

Never just 1 person

ST

Adequate aisle space must be maintained to allow unobstructed movement of personnel, fire protection equipment, spill equipment, and decontamination equipment to any area of the facility operation in an emergency, unless it can be demonstrated to the State Fire Marshal that the aisle space is not needed. (Ch 17, 006 per 004.01H)

X

Arrange to familiarize police, fire and emergency responders with the layout of the site, location and type of waste managed (Ch 17, 007.01A - 007.01C per 004.01H).

X

Arrangements to familiarize local hospitals with the types of injuries or illnesses which could result from fires, etc. (Ch 17, 007.01D ref 004.01H).

X

Document the refusal of local police, fire, emergency responders, and hospitals to enter in such arrangements (Ch 17, 007.02 ref 004.01H).

NO

Contingency plan.

- yes Copy of the plan at the facility (Ch 18, 004.01 per 004.01H).
- yes Copy of the plan submitted to the Department, Fire Marshal (for new construction), emergency responders, and hospitals (Ch 18, 004.02 per 004.01H).
- yes Plan describes agreements with emergency responders and hospitals (Ch 18, 003.03 ref 004.01H).
- yes List names, addresses and phone numbers (office and home) of the emergency coordinator, all alternates, and be kept up to date (Ch 18, 003.04 ref 004.01H). *updated June, 2013.*
- yes List and describe the location and capacity of all emergency equipment (alarms, spill control, fire control) at the site (Ch 18, 003.05 ref 004.01H).
- yes Describe the signal for evacuation and identify evacuation routes (Ch 18, 003.06 ref 004.01H). *Weekly Test*
- no The plan must be amended when it fails, when the site changes in design or operation, the list of emergency coordinators changes, list of emergency equipment changes (Ch 18, 005 ref 004.01H). *- Personnel Changes.*

Personnel training

- yes Job titles for each position related to hazardous waste management and the names of employees in those positions (Ch 19, 004.01 ref 004.01H).
- yes Written job description for each position (Ch 19, 004.02 ref 004.01H).
- yes Written description of the type and amount of introductory and continuing training given to each employee (Ch 19, 004.03 ref 004.01H).
- yes Records that document that the training or job experience required under Chapter 19, 001, 002, and 003, have been given to, and have been completed by, facility personnel (Ch 19, 004.04 ref 004.01H).
- yes Training records on personnel must be kept for three years, even after termination of employment (Ch 19, 005 ref 004.01H)

Training of Jessica Grown +
Kelly Whittlesey

Kevin Wynne - ECI

reviewed in
Depth =
OK.

4/9/2014

09.04 Used oil storage requirements for used oil generators.

009.04A Containers and aboveground tanks used to store used oil at generator facilities must be:

009.04A1 In good condition (no severe rusting, apparent structural defects or deterioration); and

009.04A2 Not leaking (no visible leaks).

009.04A3 For containers and aboveground tanks with a volume of 25 gallons or greater, they must be labeled or marked clearly with the words "Used Oil."

Maintenance Shop
- considered HW → Incinerator
none shipped; off-site
T-500 - 20,000 Gallons
NO signs of Spills or Releases
"Fuel Oil".

Exit 4/10

PARTICIPANTS

NAME	TITLE
Kelly Whittlesey	Compliance Specialist
Gerald Pennel	Fac. Incineration Manager
James Shields	Facility Operations Manager
Kelly Danegun	Facility ops. mgr.
BRADLEY BROWER	INC. MANAGER/BLENDS/ASH
Rich Roylance	LABORATORY MANAGER
Jared Hansaker	GM
Ken Redding	Maintenance Manager
Brad Reader	Main Land Engineer
Jessica Cron	Compliance Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <u>Clean Harbors Environmental Services, Inc.</u>	
Facility Address <u>2247 S Highway 71</u> <u>Kimball, NE 69145</u>	
Inspector (print) <u>Michael W. Tucker</u>	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date <u>4/10/2014</u>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <u>Jessica Crow</u>	Signature/Date <u>Jessica Crow 4-10-14</u>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name	Clean Harbors Environmental Services, Inc.
Facility Address	2247 S Highway 71 Kimball, Nebraska 69145

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- 1) Facility Diagram (1 page)
- 2) Incinerator Screen Shots (10 pages)

Facility Representative (print)	Signature/Date
Jessica Grow	Jessica Grow 4-10-14
Inspector (print)	Signature/Date
Michael W. Tucker	Michael W. Tucker
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev: 1/20/93)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Clean Harbors Environmental Services, Inc.
Address: 2247 S. Highway 71
Kimball, Nebraska 69145
EPA ID Number: NED98723513 Date: April 10, 2014

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the inspection.

<u>Citation</u>	<u>Description of Violation</u>
1) <u>T-128, Ch. 10, 005.01B</u>	<u>Failure to identify contents of satellite accumulation container (Area 20 metal Box)</u>
2) <u>Permit Condition III. D.</u>	<u>Satellite Accumulation Container not in good condition (Area 20 metal Box)</u>
3) <u>Permit Condition III. F. I.</u>	<u>Failure to close storage container (Area 85 roll-off and Area 20 metal Box)</u>
4) <u>Permit Condition IV. K. I.</u>	<u>Missing Tags at Area 50 E and Area 45 TOU.</u>

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

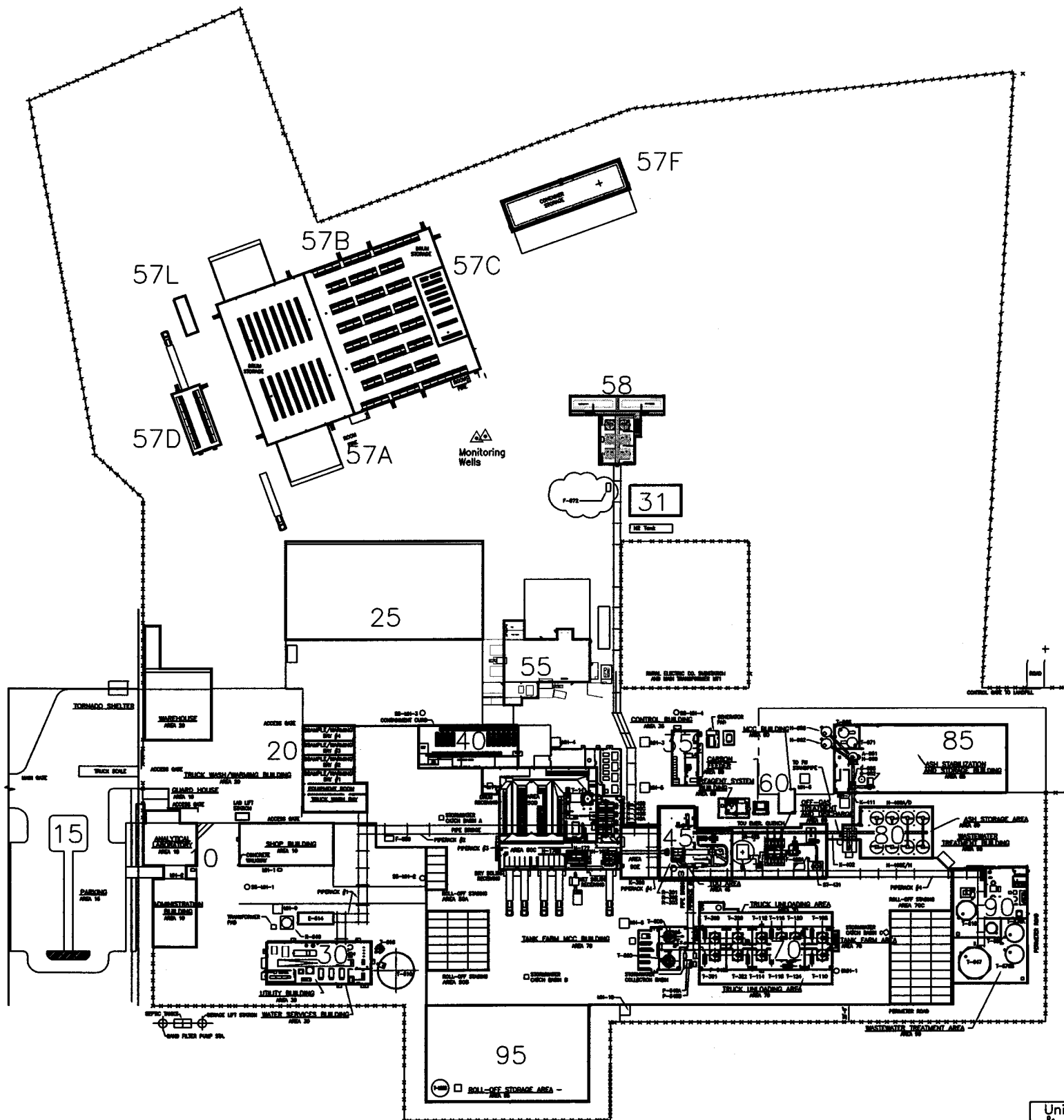
U. S. Environmental Protection Agency, Region VII
ENSV/EFCB
300 Minnesota Avenue
Kansas City, Kansas 66101
ATTN: Michael Tucker

If you have any questions about this Notice or wish to discuss your response, you may call me at 913-551-7475, or Edwin Buckner (Compliance Officer) at 913-551-7621.

This Notice prepared by Michael W. Tucker Date: April 10, 2014

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Jessica Grow Date: 4/10/14
Signature: Jessica Grow
Title: Compliance Manager



WASTE-TECH SERVICES, INC.
 1500 S. 10TH AVE., SUITE 100
 OMAHA, NE 68106
 (402) 426-1111
 WWW.WASTE-TECHSERVICES.COM

NO.	BY	DATE	CRD	WTS	DESCRIPTION
23	BDR	11/9/13			LABELED F-872
22	BDR	1/31/13			ADDED AREA 58 AND 31
20	BDR	9/23/10			REMOVED AREA 58, AREA 05, BOILER ROOM, AND CHARGE ROOM. RENAMED OXIDIZER TO 57D
18	BDR	10/21/09			LABELED AREA 57L LAB
16	BDR	5/3/09			CORRECTED EXPANSION FENCE LINE AND BUILDING LAYOUT
17	BDR	2/9/09			UPDATED AREA BOUNDARIES
18A	MPC	1/23/08			UPDATED AREA BOUNDARIES
18B	MPC	11/14/08			ADDED AREA BOUNDARIES
16	RLW	06/09/08	RLW		CORRECTING BUILDING SIZES AREA 57-59

DEPT	REV	8	0	1	2	3	4	5	6	7	8	9
PROCESS	RW											
ARCH.												
CIVIL/STRUCT.	DMH											
MECH.	LRH											
ELECT.	LZ											
INSTR.	EM											
PIPING	LRH											
SAFETY												
PROJECT ENG.	SCR											
PROJECT MOR.	RL											

United Engineers
 & Constructors
 A Raytheon Company
 Stearns-Roger Division

PROJECT No.
 9948.001

WTS PROJECT NO. 154415
 MK PROJECT NO. 3820

DRAWN BY: D.A.B./JLM DATE: 09/28/09

MK-ENVIRONMENTAL SERVICES
 A DIVISION OF MK PENSACOLA COMPANY

WASTE-TECH SERVICES, INC.
 PROPRIETARY DATA
 THIS DOCUMENT IS PROPERTY OF WASTE-TECH SERVICES, INC.
 AND IS LOANED UPON THE CONDITION THAT IT IS TO BE
 RETURNED UPON REQUEST. IT IS NOT TO BE REPRODUCED,
 COPIED OR USED IN ANY WAY DETRIMENTAL TO THE
 INTEREST OF WASTE-TECH SERVICES, INC.

REV BY DATE

ENGINEER

REVIEWER 9

DESIGNER

OPERATOR

PREPARED 9

WTS APPROVALS

Clean Harbors

KIMBALL TOU KIMBALL COUNTY
 NEBRASKA

AREA DESIGNATION INDEX

FILE NO. 05341011 DRAWING NO. 05-34-1011 REV. 23
 SCALE 1/64"=1'-0" RELEASE DATE SHEET OF

OR: KIMCON2



View a Site Identification Form

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC.

KIMBALL

NED981723513

Navigational Shortcuts: [General Information](#) [Reason](#) [Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing](#) [Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)

Last Updated By: HST

Last Updated On: 12/11/2013 10:06:14

General Information

Received Date: *	12/02/2013	Non-notifier:	Select a Non-notifier.	Extract to Public? <input checked="" type="checkbox"/>
Accessibility:	Select an Accessibility			Send Acknowledgement: <input type="checkbox"/>

1. Reason for Submittal *

<input type="checkbox"/>	To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID Number for this location). [Source N]
<input type="checkbox"/>	To provide a Subsequent Notification (to update site identification information for this location). [Source N]
<input type="checkbox"/>	As a component of a First RCRA Hazardous Waste Part A Permit Application. [Source A]
<input checked="" type="checkbox"/>	As a component of a Revised RCRA Hazardous Waste Part A Permit Application. [Source A]
<input type="checkbox"/>	As a component of the Hazardous Waste Report. [Source R]
<input type="checkbox"/>	Implementer - Agency that is implementer of Record for Handler. [Source I]
<input type="checkbox"/>	Emergency. [Source E]
<input type="checkbox"/>	Temporary. [Source T]

2. Site ID

EPA ID: *	NED981723513	Activity Location: *	NE	
-----------	--------------	----------------------	----	--

3. Site Name

Name: *	CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
---------	--

4. Site Location (Physical address, not P.O. Box or Route)

Number:	2247				
Street 1: *	S HIGHWAY 71				
Street 2:					
City, Town or Village: *	KIMBALL	County: *	KIMBALL		
State: *	NEBRASKA	Country: *	UNITED STATES	Zip Code: *	69145
State District:	Districts are not available yet for this state				

5. Site Land Type

--

Land Type: *	Private
--------------	---------

6. North American Industry Classification System (NAICS) [Hint](#)

NAICS A: *	562211 (Primary)	NAICS B:		NAICS C:		NAICS D:	
------------	---------------------	----------	--	----------	--	----------	--

7. Site Mailing Address

Number:	2247				
Street 1: *	S HIGHWAY 71				
Street 2:					
City, Town or Village: *	KIMBALL				
State: *	NEBRASKA	Country: *	UNITED STATES	Zip Code: *	691459727

8. Site Contact Person

First Name: *	JARED	Middle Initial:	W	Last Name: *	HUNSAKER
Title:	GENERAL MANAGER				

8a. Site Contact Address

Number:	2247				
Street 1:	S HIGHWAY 71				
Street 2:					
City, Town or Village:	KIMBALL				
State:	NEBRASKA	Country:	UNITED STATES	Zip Code:	691459727
Email Address:	HUNSAKERJ@CLEANHARBORS.COM				
Phone Number: *	3082358200	Ext:		Fax:	3082354307

9. Legal Owner and Operator * [Hint](#)

A. Legal Owner Add Delete All Owners						
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
1	CO	P	CLEAN HARBORS INC.	42 LONGWATER DRIVE NORWELL MA 02061	05/18/1995	
B. Legal Operator Add Delete All Operators						
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
2	CP	P	CLEAN HARBORS ENVIRONMENTAL SERVICES INC	2247 S HIGHWAY 71 KIMBALL NE 691459727 US	05/18/1995	

10. Type of Federal Regulated Waste Activity

A. Hazardous Waste Activities (Complete all parts 1-7)	
1. Generator of Hazardous Waste (Federal) * <input type="checkbox"/> a. - c. 1 - Large Quantity Generator *	2. Transporter of Hazardous Waste <input type="checkbox"/> a. HW Transporter <input type="checkbox"/> b. HW Transfer Facility
Generator of Hazardous Waste (State) * <input type="checkbox"/> 1 - LQG *	<input checked="" type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste Note <input type="checkbox"/> 4. Recycler of Hazardous Waste Note
5. Exempt Boiler and / or Industrial Furnace	
Indicate other generator activities (check all that apply).	
<input type="checkbox"/> d. Short Term Generator Note	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/> e. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> f. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control
	<input checked="" type="checkbox"/> 7. Receives Hazardous Waste from Off-site
B. Universal Waste Activities	C. Used Oil Activities
1. Large Quantity Handler of Universal Waste Note <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> Generated Accumulated/Managed Batteries <input checked="" type="checkbox"/> Lamps <input checked="" type="checkbox"/> Pesticides <input checked="" type="checkbox"/> Mercury containing equipment <input checked="" type="checkbox"/> </div>	1. Used Oil Transporter - Indicate types of activities. <input type="checkbox"/> a. Transporter <input type="checkbox"/> b. Transfer Facility 2. Used Oil Processor and / or Re-refiner - Indicate types of activities. <input type="checkbox"/> a. Processor <input type="checkbox"/> b. Re-refiner <input type="checkbox"/> 3. Off-Specification Used Oil Burner 4. Used Oil Fuel Marketer - Indicate types of activities. <input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner <input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Destination Facility for Universal Waste Note	
D. Eligible Academic Entities with Laboratories - Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K. Note	
1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories. Note	
<input type="checkbox"/> a. College or University	
<input type="checkbox"/> b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university.	
<input type="checkbox"/> c. Non-profit institute that is owned by or has a formal written affiliation agreement with a college or university.	
<input type="checkbox"/> 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories.	
E. State Activities	
No State Activities Available.	

11. Description of Hazardous Waste [Hint](#)

Dropdown Size: 5

Type D Select All / Remove All	Type F Select All / Remove All	Type K Select All / Remove All	Type P Select All / Remove All	Type U Select All / Remove All	Type X Select All / Remove All

<div>D001 D002 D003 D004 D005 D006 D007 D008 D009 D010</div>	<div>F001 F002 F003 F004 F005 F006 F007 F008 F009 F010</div>	<div>K001 K002 K003 K004 K005 K006 K007 K008 K009 K010</div>	<div>LABP P001 P002 P003 P004 P005 P006 P007 P008 P009</div>	<div>U001 U002 U003 U004 U005 U006 U007 U008 U009 U010</div>	<div>P127 P128 P199 U404 U411 UOIL</div>
Total D Selected: 43	Total F Selected: 21	Total K Selected: 115	Total P Selected: 122	Total U Selected: 242	Total X Selected: 0

12. Notification of Hazardous Secondary Material (HSM) Activity

Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23),(24), or (25)?

13. Comments [Clear Notes](#)

Chars Remaining 3887

Part A Approval Date December 2, 2013. Section 13. Comments. Remaining waste codes can be found on pages 5 of 6.

14. Certification *[Hint Read the certification.](#)

First Name:	M.I.:	Last Name:	Title:	Date Signed:
JARED		HUNSAKER	GENERAL MANAGER	11/18/2013
MICHAEL		CRISENBERY	VP ENV COMPLIANCE	11/11/2013

Hazardous Waste Permit Information Form (Part A)**1. Facility Permit Contact**

Title:	GENERAL MANAGER				
First Name: *	JARED	Middle Initial:	W	Last Name: *	HUNSAKER
Phone Number: *	3082358200	Extension:		Email Address:	HUNSAKERJ@CLEANHARBOR.

2. Facility Permit Contact Mailing Address

Number:	2247				
Street 1:	S HIGHWAY 71				
Street 2:					
City:	KIMBALL	State:	NEBRASKA		
Zip Code:	69145	Country:	UNITED STATES		

3. Operator Mailing Address and Telephone Number

Please see 9B above.

4. Legal Owner Mailing Address and Telephone Number

Please see 9A above.

5. Facility Existence Date

Facility Existence Date: *	01/01/1989
----------------------------	------------

6. Other Environmental Permits

Permit Type:	Permit Number:	Description:
P	03R1-001	DEQCLASS 1 OPERATING
N	NE012782	NPDES PERMIT
S	NE0203238	DEQ SOLID WASTE
R	NED981723513	RCRA PART B PERMIT
E	USEPA HSWA	PART2 NED981723513

7. Nature of Business [Hint](#)

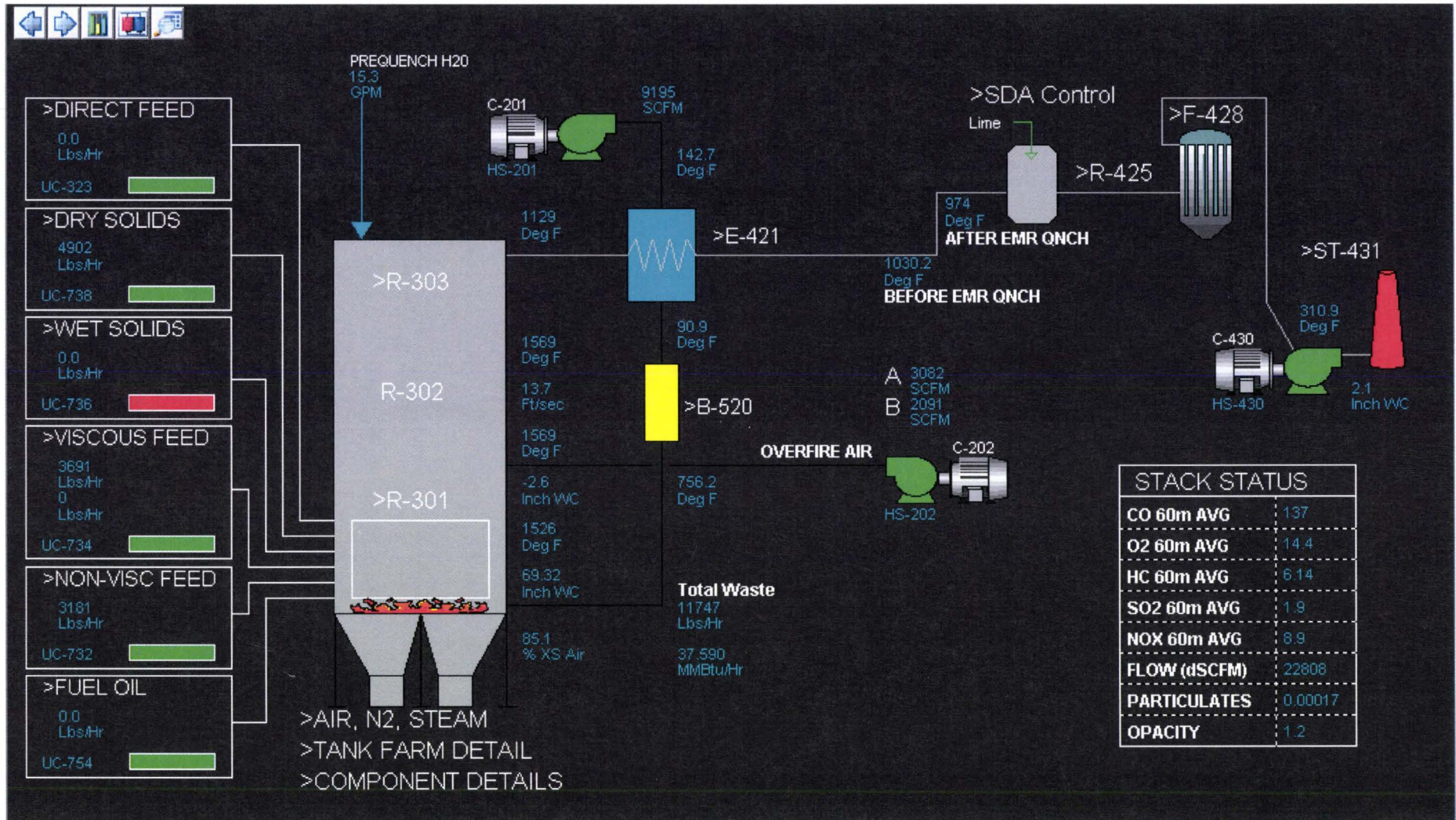
Please see 12 above.

Navigational Shortcuts: [General Information](#) [Reason](#) [Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing](#) [Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)

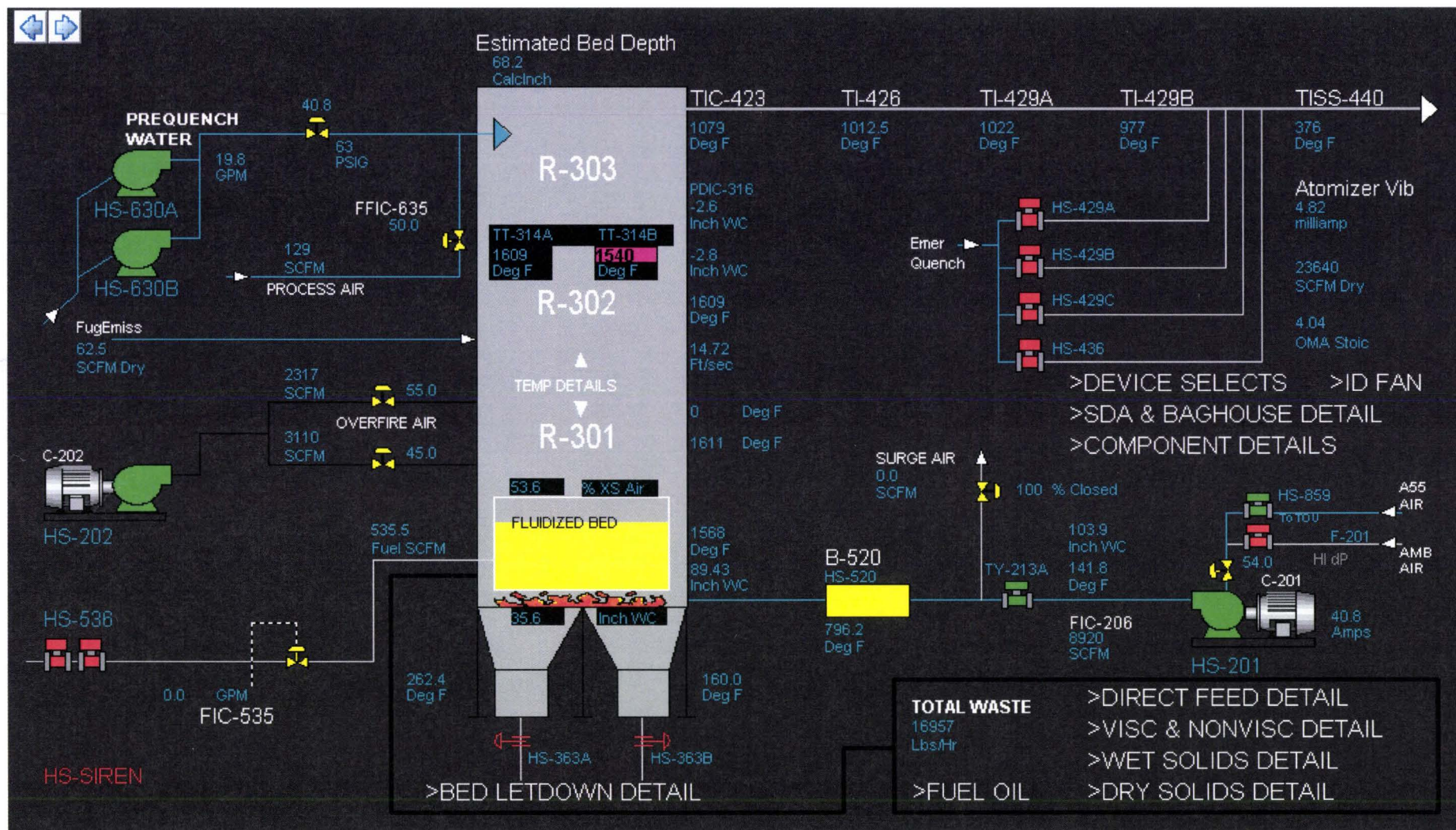
[Back to the Handler Main Menu](#)

URL: /rcrainfo/handler/siteidmntn.jsp

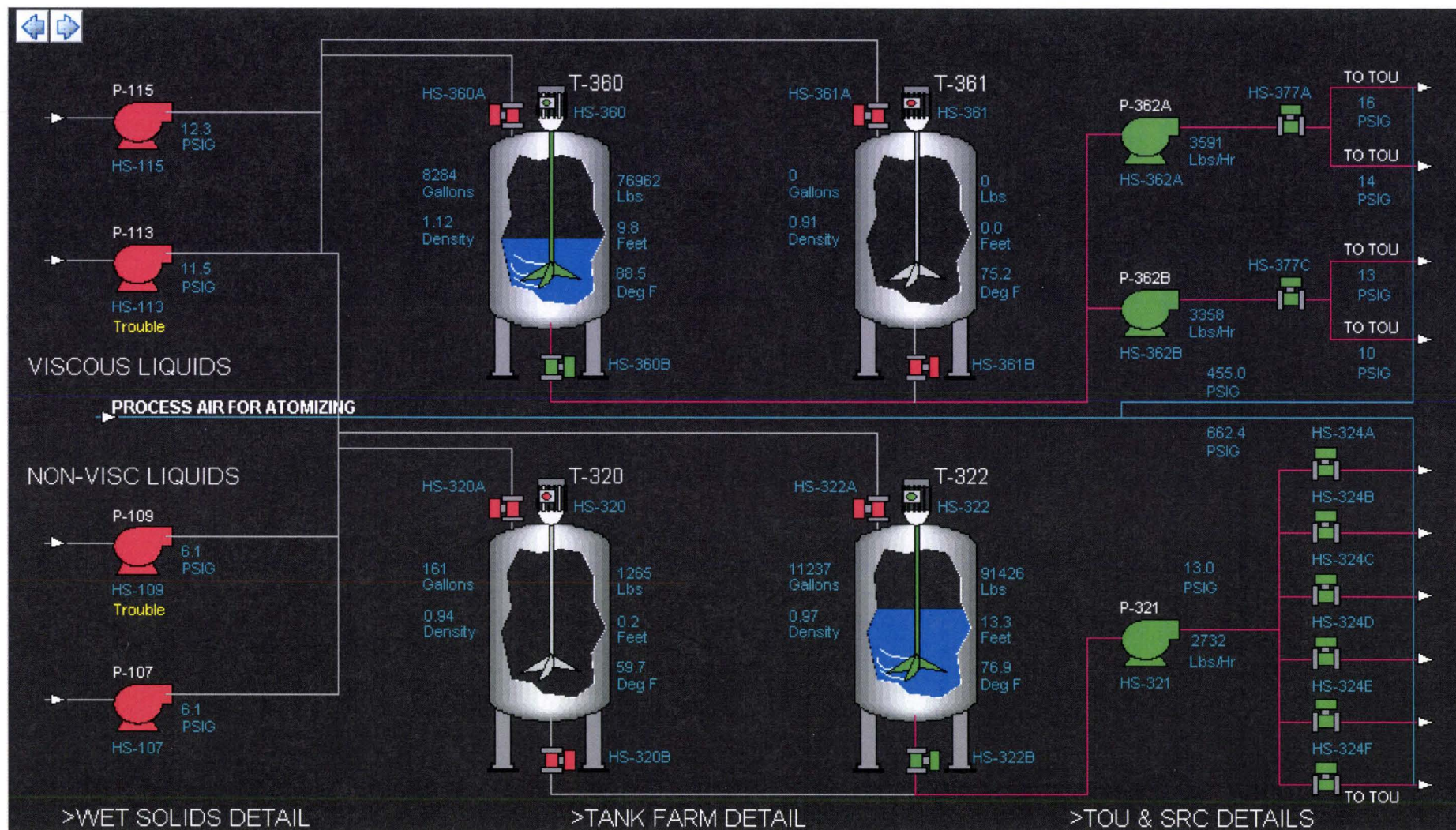
Morning April 8, 2014



Morning April 8, 2014



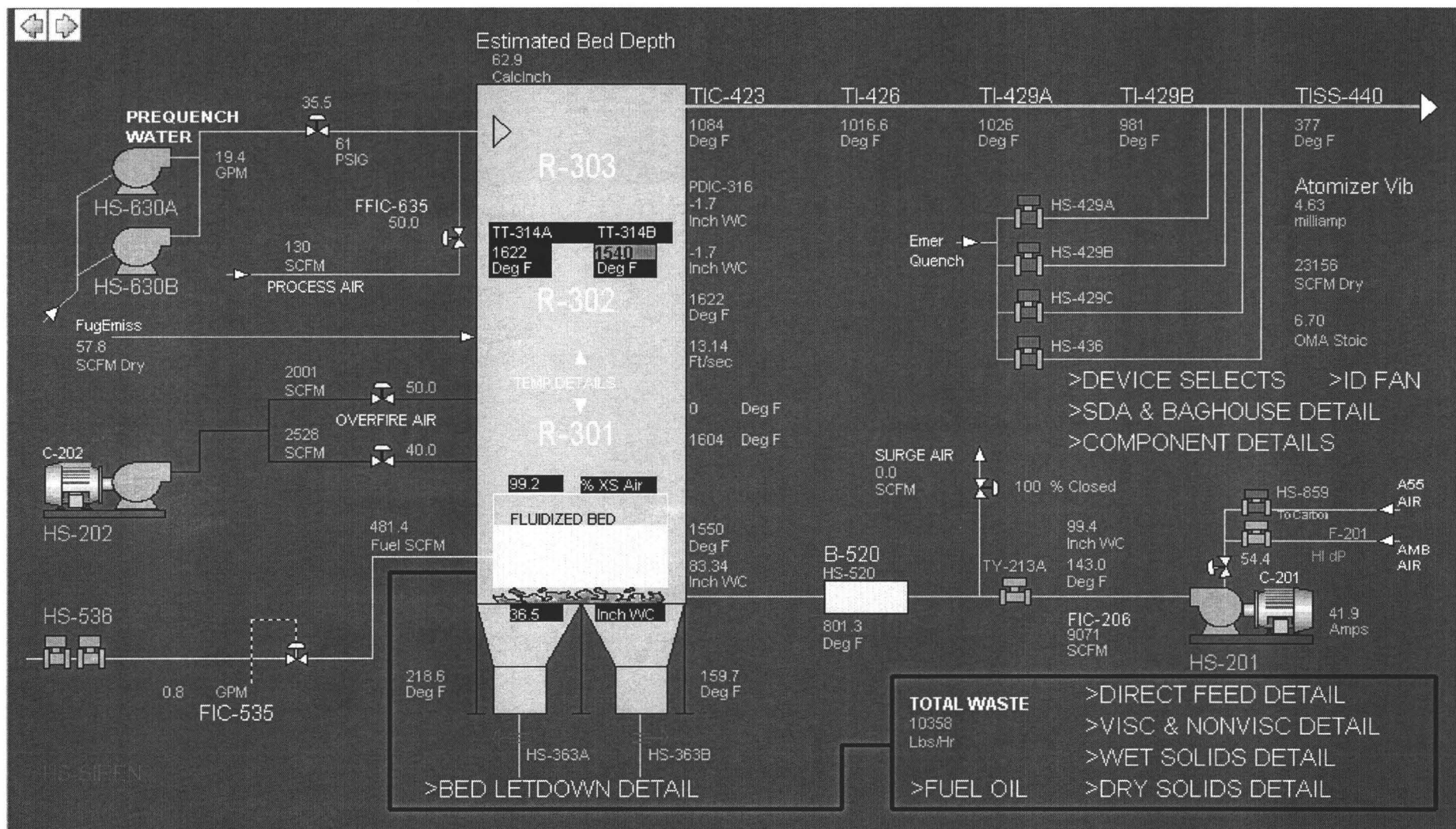
Morning April 8, 2014



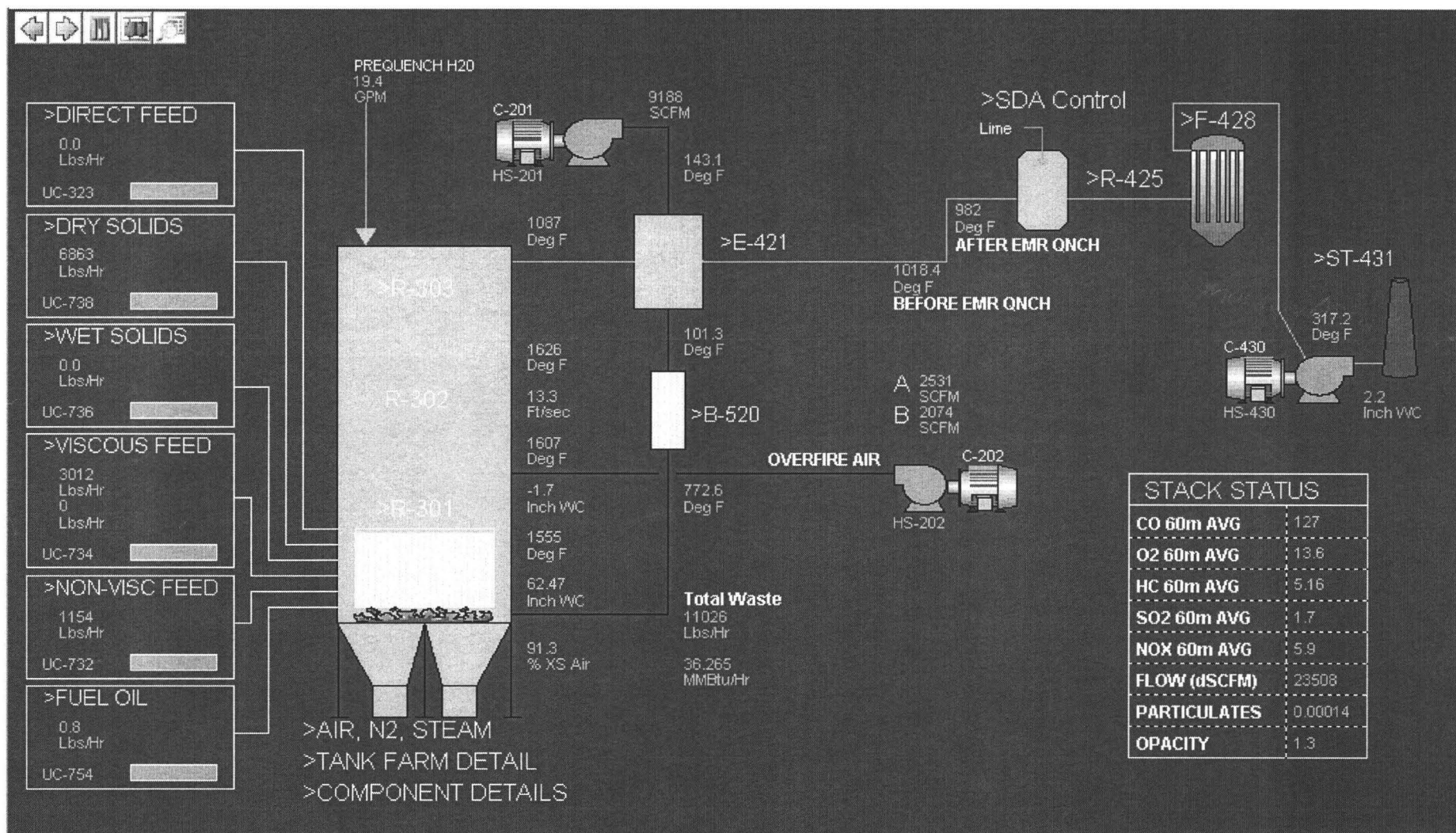
Morning, April 8, 2014



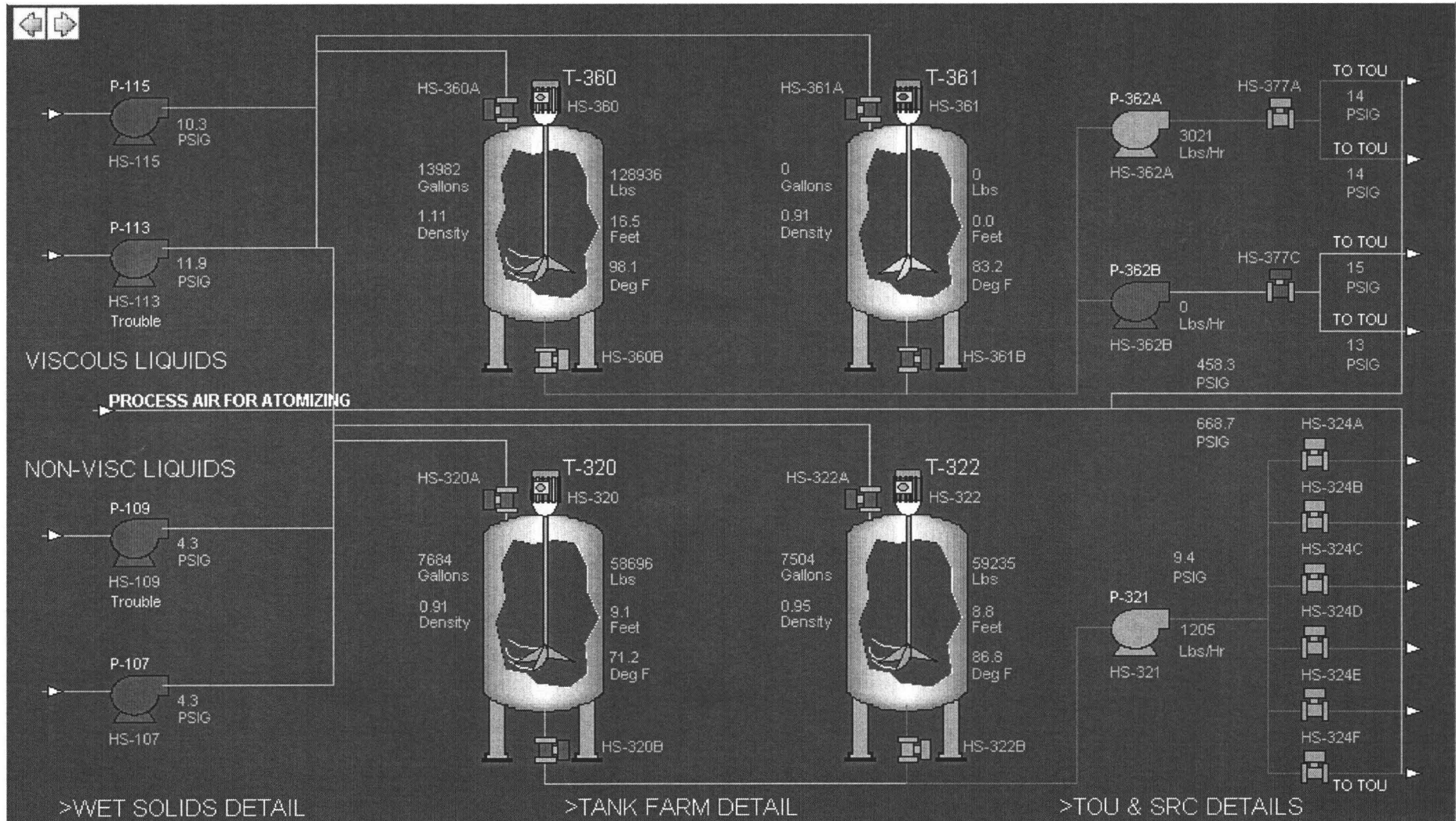
morning April 9, 2014



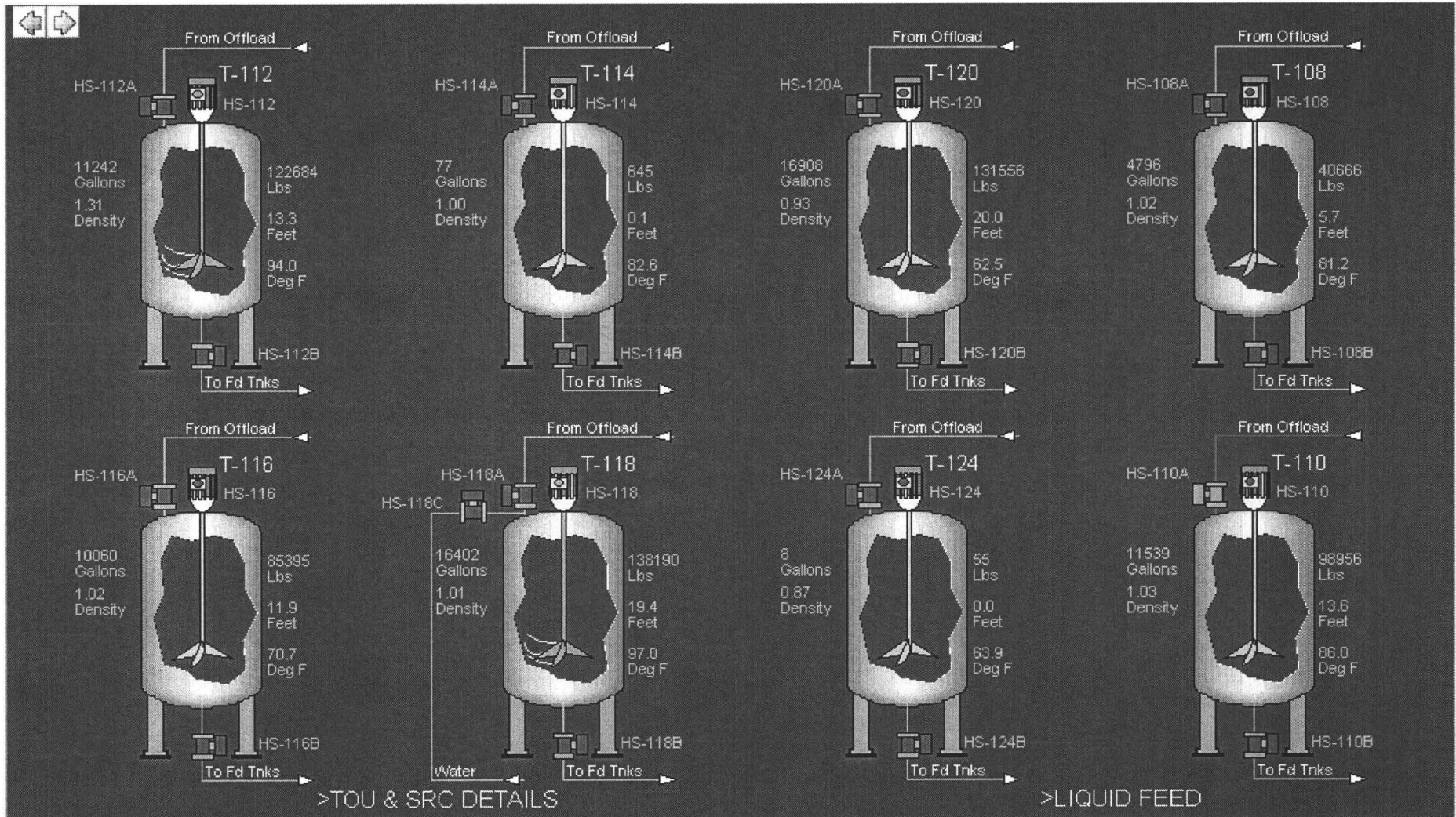
morning April 9, 2014



morning April 9, 2014



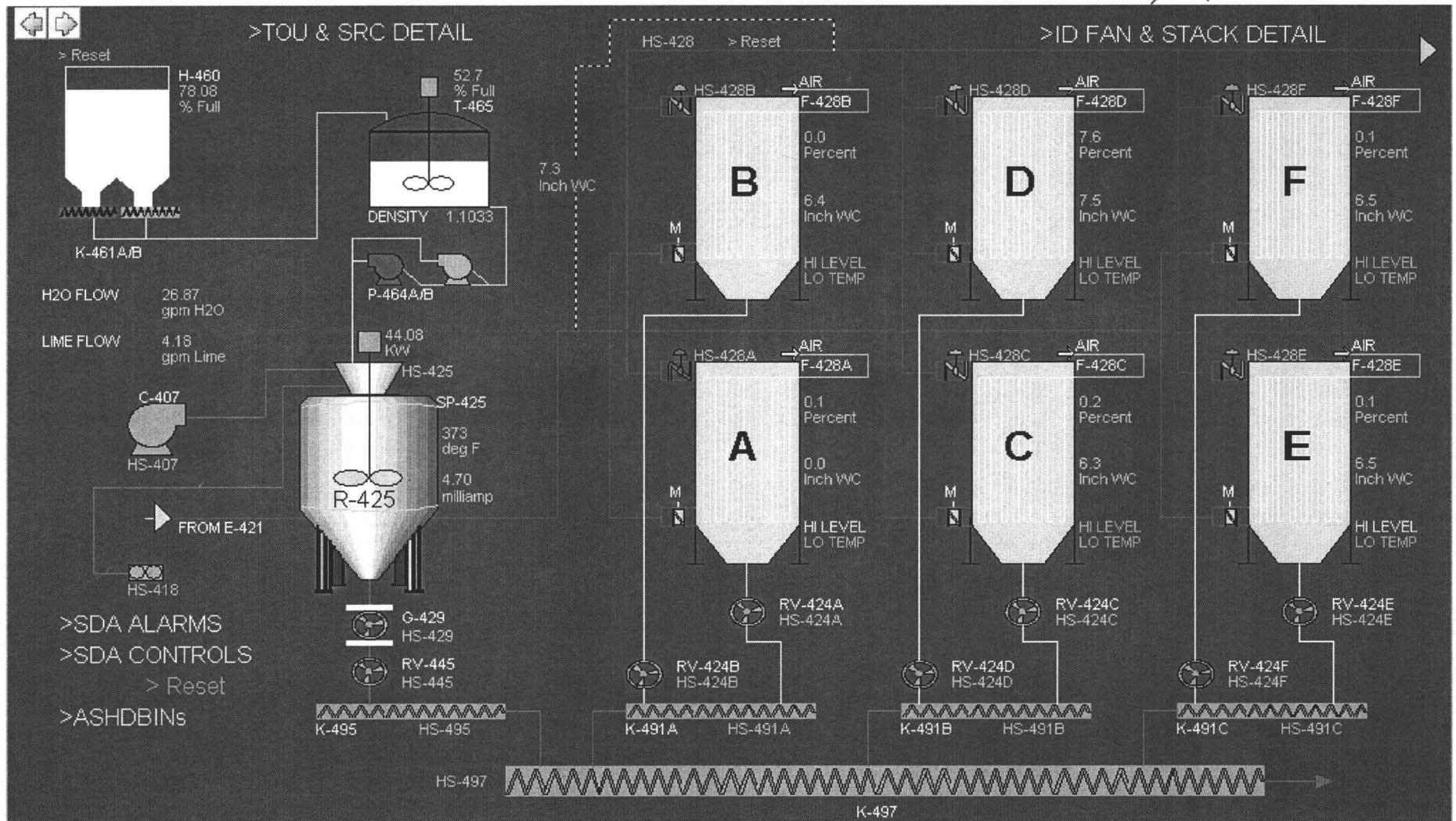
morning Apr 19, 2014



morning April 9, 2014

Waste Analysis Summary and Status Screen											
Waste Feed Rate											
Total	Limit										
5817	21000										
1HAvgPPH	All units in pounds per hour										
	Heat Value in millions BTU/hr (MMBtu/hr)										
	Feed Totals (Min Roll Avg)	Feed Totals (Hr Roll Avg)	Permit Limits	Direct Feeds	Dry Solids A	Dry Solids B	Wet Solids	T-320	T-322	T-360	T-361
Antimony	0.1075	0.0581	10.6950	0.000	0.064	0.000	0.000	0.000	0.011	0.030	0.000
Arsenic	0.47046	0.25510	5.60000	0.0000	0.2590	0.0000	0.0000	0.0000	0.0615	0.1434	0.0000
Barium	1.489	0.763	40.700	0.00	1.37	0.00	0.00	0.00	0.07	0.01	0.00
Beryllium	0.01075	0.00581	0.20950	0.0000	0.0064	0.0000	0.0000	0.0000	0.0011	0.0030	0.0000
Cadmium	0.01421	0.00765	1.81950	0.0000	0.0080	0.0000	0.0000	0.0000	0.0021	0.0038	0.0000
Chromium	0.4343	0.2209	55.0000	0.000	0.325	0.000	0.000	0.000	0.091	0.008	0.000
Lead	0.187	0.096	53.799	0.00	0.13	0.00	0.00	0.00	0.04	0.00	0.00
Mercury	0.0098	0.0050	0.0540	0.0000	0.0092	0.0000	0.0000	0.0000	0.0002	0.0001	0.0000
Nickel	4.445	2.259	145.950	0.00	3.52	0.00	0.00	0.00	0.80	0.03	0.00
Selenium	0.10748	0.05812	2.89500	0.0000	0.0640	0.0000	0.0000	0.0000	0.0116	0.0304	0.0000
Silver	0.01769	0.01013	2.27950	0.0000	0.0064	0.0000	0.0000	0.0000	0.0011	0.0099	0.0000
Thallium	0.1075	0.0581	0.2720	0.0000	0.0640	0.0000	0.0000	0.0000	0.0116	0.0304	0.0000
Chlorine	42.99	23.69	783.00	0.0	18.	0.0	0.0	0.0	7.4	16.	0.0
Sulfur	4.92	2.65	No Limit	0.0	2.9	0.0	0.0	0.0	0.5	1.3	0.0
BTU's	35.7	31.2	No Limit	0	19	0	0	0	7342	1894	0
Ash	3971	2377	12000	0	385	0	0	0	15	42	0
Flouride	5	3	N/A	0.00	3.90	0.00	0.00	0.00	0.40	0.61	0.00
Bromide	10	6	N/A	0.00	5.65	0.00	0.00	0.00	0.85	3.76	0.00
Calcium	N/A	N/A	N/A	0.00	135.	0.00	0.00	0.00	1.57	0.27	0.00
Potassium	N/A	N/A	N/A	0.00	6.20	0.00	0.00	0.00	0.23	4.94	0.00
Sodium	N/A	N/A	N/A	0.00	5.13	0.00	0.00	0.00	1.20	11.6	0.00
\$ /LB	N/A	N/A	N/A	0.000	1172.	0.000	0.000	0.000	52.20	379.9	0.000
Stoic Ratio	6.67	11.76	2.52	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Risk Calc	N/A	0.04113	1.13950	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Valid Data				INVALID	VALID DATA	INVALID	VALID DATA	INVALID	VALID DATA	VALID DATA	VALID DATA

morning April 9, 2014



morning Apr 19, 2014



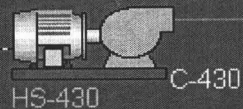
- >COMPONENT DETAILS
- >TOU & SRC DETAILS
- >SDA & BAGHOUSE DETAIL

FROM BAGHOUSE

306.4
Deg F

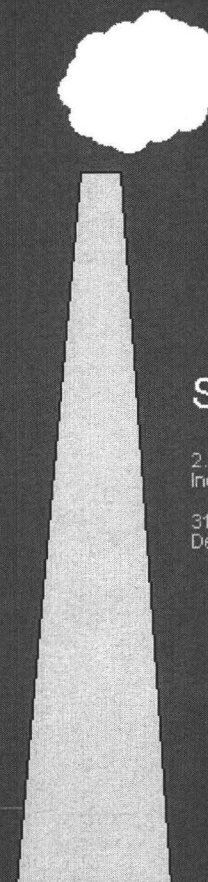
STACK STATUS		Permit Limit
O2 60m AVG	14.5	3 vol % dry
HC 60m AVG	4.55	10 ppm
SO2 60m AVG	1.5	57 lb/hr
NOX 60m AVG	6.0	57 lb/hr
FLOW (dSCFM)	20582	25,151 dscfm
PARTICULATES	0.0001	0.015 gr/dscf
OPACITY	1.3	10%

ID Fan dP
16.78
Inch WC



24.67
lbs/hr
49.74
%
55.3 1800
Amps Timer
FLA=65 Amps

PDIC-316
-3.0
Inch WC
61.4
% Closed



ST-431

2.2
Inch WC
317.7
Deg F

>DEVICE SELECTS